

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

**Latasha Holloway, *et al.*,**

**Plaintiffs,**

**v.**

**City of Virginia Beach, *et al.*,**

**Defendants**

**Civil Action No. 2:18-cv-0069**

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**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

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**PLAINTIFFS' EXHIBIT 35**

Deposition Transcript of Virginia Beach City Council Member Rosemary Wilson  
(Volume I only)



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# Transcript of Rosemary Wilson

**Date:** October 3, 2019

**Case:** Holloway, et al. -v- City of Virginia Beach, et al.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

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LATASHA HOLLOWAY and :  
GEORGIA ALLEN, :  
Plaintiffs, : CASE NO.  
v. : 2:18cv00069  
CITY OF VIRGINIA BEACH, et al., :  
Defendants. :  
-----x

Deposition of ROSEMARY A. WILSON

Virginia Beach, Virginia

Thursday, October 3, 2019

2:18 p.m.

Volume I

Job No. 265819

Pages 1 - 151

Reported by: Penny C. Wile, RPR, RMR, CRR

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

2

1                   Deposition of ROSEMARY A. WILSON, held at  
2                   the offices of:

3  
4  
5                   VIRGINIA BEACH CITY ATTORNEY  
6                   2401 Courthouse Drive  
7                   Municipal Center, Building One  
8                   Room 260  
9                   Virginia Beach, VA 23456  
10                  (757) 385-4351

11  
12  
13  
14  
15  
16  
17                  Pursuant to Notice, before Penny C. Wile,  
18                  RPR, RMR, CRR, Notary Public of the Commonwealth  
19                  of Virginia.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

3

1 A P P E A R A N C E S

2 ON BEHALF OF THE PLAINTIFFS, LATASHA HOLLOWAY  
3 AND GEORGIA ALLEN:

4 DANIELLE LANG, ESQUIRE

5 CHRISTOPHER LAMAR, ESQUIRE

6 CAMPAIGN LEGAL CENTER

7 1101 14th Street NW

8 Suite 400

9 Washington, DC 20005

10 (202) 736-2200

11

12 ON BEHALF OF THE DEFENDANTS, CITY OF VIRGINIA  
13 BEACH, ET AL.:

14 CHRISTOPHER S. BOYNTON, ESQUIRE

15 OFFICE OF THE VIRGINIA BEACH CITY ATTORNEY

16 2401 Courthouse Drive

17 Municipal Center, Building One

18 Room 260

19 Virginia Beach, VA 23456

20 (757) 385-4351

21

22 Also present: Jeffrey Zalesin

Transcript of Rosemary Wilson  
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1 P R O C E E D I N G S

2 Whereupon,

3 ROSEMARY A. WILSON,

4 after having been first duly sworn, was examined  
5 and did testify under oath as follows:

6 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS:

7 BY MS. LANG:

8 Q. Good afternoon, Ms. Wilson. I'm Danielle  
9 Lang. I am counsel for the plaintiffs in this  
10 case.

11 Have you ever been deposed before?

12 A. Never.

13 Q. Okay. So I'm going to go over some ground  
14 rules to begin with.

15 As you can see, the court reporter is  
16 taking down everything we say. Her need to take  
17 down everything we say kind of informs the way we  
18 need to speak to each other. So ordinarily it's  
19 very common for us to finish each other's  
20 sentence, predict what someone is going to say,  
21 talk over each other a bit. That's very hard for  
22 the court reporter to take down, so I'd ask that

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1 you, you know, wait until I finish. And I'll do  
2 my very best to wait until you finish before I ask  
3 my next question.

4 Does that make sense?

5 A. Yes.

6 MR. BOYNTON: You have to answer audibly.

7 Q. My next instruction is that, likewise  
8 because the court reporter is here, we usually say  
9 uh-uh or uh-huh or we shake our head or nod. None  
10 of that is easy for the court reporter to take  
11 down, so I'd ask you give yes or no, clear, verbal  
12 answers.

13 A. Yes.

14 Q. From time to time your counsel will make  
15 objections. There are two different kinds of  
16 objections, broadly speaking. One is an objection  
17 to something about the form of my question. Those  
18 are all just for the court, preserving them for  
19 the court down the road. And you need not worry  
20 about them, and you can answer the question that I  
21 have given.

22 Then there will be another form of an



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1 objection that might relate to something that is  
2 privileged information. And, then, your counsel  
3 might instruct you not to answer or at least not  
4 to answer with respect to certain kinds of  
5 information.

6 Thus far, in this case there's been two  
7 different kinds of those objections. One is  
8 attorney-client privilege. I don't want you to  
9 share with me at any time anything that you said  
10 to your counsel or that your counsel said to you.  
11 You can share with me that you met with your  
12 counsel and when that happened and who you met  
13 with, but not the substance of those  
14 conversations.

15 Does that make sense?

16 A. Yes.

17 Q. The second type of privilege that you  
18 might invoke is what's called legislative  
19 privilege. Legislative privilege only covers  
20 conversations between you -- private conversations  
21 between you and other City Council members. If  
22 others that were not City Council members or your

Transcript of Rosemary Wilson  
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1 counsel are present, the privilege does not apply.

2 So only -- and if you've shared a  
3 conversation that you had with a Council member to  
4 your husband or to anyone else --

5 A. I'm not married.

6 Q. Sorry. I apologize.

7 A. I'm a widow.

8 Q. I'm sorry.

9 If you shared this conversation with  
10 anyone outside of the City Council, the privilege  
11 no longer applies and you need to answer the  
12 question with respect to those conversations.

13 MR. BOYNTON: Well, you know, we will have  
14 to answer or deal with those questions on a  
15 question-by-question basis. But as a general  
16 proposition, do you wish to invoke legislative  
17 privilege to the extent it's applicable today?

18 A. Yes.

19 Q. If you don't understand a question that I  
20 ask, please go ahead and ask me to rephrase. I'm  
21 happy to do that. Otherwise, I'll assume that you  
22 understood the question.

Transcript of Rosemary Wilson  
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1 Is there any reason that you can think of  
2 that you cannot answer questions truthfully today?

3 A. I don't lie.

4 Q. So no?

5 A. That's my answer.

6 Q. Okay. Can you state your full name and  
7 your position for the record?

8 A. Rosemary Ann Wilson. I'm City Council  
9 At-Large.

10 Q. Okay. Are you from Virginia Beach?

11 A. I was not born here.

12 Q. Okay. When did you move to Virginia  
13 Beach?

14 A. When I was five-years-old.

15 Q. Okay. And have you lived in Virginia  
16 Beach since you were five-years-old?

17 A. No.

18 Q. Okay. How much time have you spent away  
19 from Virginia Beach since then?

20 A. About six years.

21 Q. Okay. Was that to go to school or you  
22 moved to a different city?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1           A. I was a Navy child. We moved to Florida  
2 when I was six, came back. And, then, I went to  
3 college out-of-state --

4           Q. Okay.

5           A. -- for a few years.

6           Q. Other than that, you've lived in Virginia  
7 Beach; is that correct?

8           A. Since I was 25.

9           Q. Okay.

10          A. Wait a minute. I lived in Chesapeake for  
11 a couple of years --

12          Q. Okay.

13          A. -- when I first got married.

14          Q. And --

15          A. So it might have been longer than six  
16 years. Sorry.

17          Q. That's okay.

18          A. I really wasn't expecting that question.

19          Q. What district do you currently live in?

20          A. The Beach.

21          Q. Okay. And how long have you lived in the  
22 Beach district?

Transcript of Rosemary Wilson  
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1 A. Six-and-a-half years.

2 Q. And you mentioned that you went to  
3 college. Can you tell me about your educational  
4 background?

5 A. I have a B.S. in Education, Early  
6 Childhood, K through 7.

7 Q. And any other degrees?

8 A. I had some graduate work but not a degree.

9 Q. Okay. And where did you get your B.S.  
10 from?

11 A. Old Dominion University.

12 Q. Okay. What have you done as a career,  
13 outside of being a City Council member?

14 A. Teacher, and a realtor.

15 Q. How long were you a teacher for?

16 A. Six years.

17 Q. Okay. And what did you teach?

18 A. Kindergarten, first, second, fourth.

19 Q. Okay. And how long have you been a real  
20 estate agent?

21 A. Twenty years.

22 Q. Okay. Is that your current occupation?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 A. Uh-huh.

2 MR. BOYNTON: Yes or no.

3 A. Yes.

4 Q. Do you have your own practice or do you  
5 work for a realtor?

6 A. I work with Howard Hanna Real Estate.

7 Q. Okay. And have you been with them for the  
8 past 20 years?

9 A. No.

10 Q. Okay. How long have you been with that  
11 agency?

12 A. A year-and-a-half.

13 Q. And where were you before that?

14 A. Berkshire Hathaway HomeServices.

15 Q. Okay. And in your current realtor  
16 position, is it mostly personal homes?

17 A. Residential.

18 Q. Residential.

19 Okay. And was that the case in your prior  
20 employment, too?

21 A. Yes.

22 Q. Okay. When did you first learn about this

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 lawsuit?

2 A. I don't remember.

3 Q. What's your best -- what's your first  
4 memory of knowing about this lawsuit, your best  
5 approximation?

6 A. Something in our package, in our mail, I  
7 read about it, but I couldn't tell you when. We  
8 get lots of stuff all the time, so I can't tell  
9 you. I don't know.

10 Q. And what's your best understanding of what  
11 this lawsuit is about?

12 A. Challenging our voting system.

13 Q. And why is it being challenged?

14 A. You tell me.

15 MR. BOYNTON: Well, to the extent you  
16 understand.

17 A. Yes.

18 Q. So why --

19 MR. BOYNTON: To the extent you understand  
20 what the suit is about, she's asking for your  
21 understanding.

22 A. Challenging our voting system.

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1 Q. On what basis?

2 A. That rather than an at-large system, to be  
3 a ward system.

4 Q. And on what basis? What's the claim as to  
5 why the current system is not lawful?

6 A. I wouldn't say it's not lawful.

7 Q. All right. I'm not asking you to say  
8 that.

9 What is your understanding of what the  
10 plaintiffs' claim is as to why there should be a  
11 change in the system?

12 A. I don't think that's up to me. I think  
13 that's up to you-all.

14 Q. But it is -- what is your understanding of  
15 what the lawsuit is --

16 A. I don't think that's up for me to have to  
17 say.

18 MS. LANG: We're going to be here for a  
19 lot longer.

20 A. I mean, it's for me to explain their --

21 MR. BOYNTON: I hear you. I don't  
22 disagree with you. But in this context if you can



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1 just say your understanding -- it's not legally  
2 binding on us or anything like that -- as to what  
3 you think their reasons are for the suit or what  
4 the underlying basis is is helpful to --

5 A. It affects the racial ability of people to  
6 get elected.

7 Q. Okay. There might be a number of  
8 questions that I ask that you think are not  
9 questions that I should be asking, but the nature  
10 of this forum is that unless there is some sort of  
11 privilege you're required to answer those  
12 questions.

13 MR. BOYNTON: It's a pretty open-ended  
14 process, to be fair. And we'll just have to get  
15 through it, so...

16 Q. What did you do to prepare for this  
17 deposition?

18 A. Nothing. Well, excuse me. I talked to my  
19 attorney on the phone for about 15 minutes.

20 MR. BOYNTON: I don't know how long it  
21 was.

22 A. We had a brief conversation.

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1 Q. And you talked to Mr. Boynton?

2 A. Yes.

3 Q. Okay. And when was that phone call?

4 A. Last week.

5 Q. Okay. Have you talked to anyone else  
6 about the fact that you're coming in for this  
7 deposition?

8 A. I mentioned I'm coming in but not what the  
9 topic was. I was at an event I had to leave. I  
10 said, I'm being deposed.

11 Q. Okay. And that was at this event earlier  
12 today?

13 A. I had a luncheon.

14 Q. And what was that event?

15 A. It was Eggleston Services that does --  
16 what they do is they help disabled people with  
17 employment and managing to live their lives.

18 Q. And was that a campaign event?

19 A. No.

20 Q. Okay. You have an event later today; is  
21 that correct?

22 A. That's correct.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Q. And what's that event?

2 A. It is a campaign event, Meet and Greet  
3 Rosemary. And I have to be there.

4 Q. Okay. And where is that?

5 A. Mermaid Winery on Shore Drive.

6 Q. Okay. Did you review any documents in  
7 preparing for this deposition?

8 A. Nope.

9 Q. Did you bring any documents with you  
10 today?

11 A. No.

12 Q. Okay. In 2020, do you have any sense of  
13 travel plans that might stop you from being able  
14 to appear at a trial?

15 A. No.

16 Q. Okay. Any other reason --

17 A. Oh. 2020?

18 Q. Yes.

19 A. I don't know. I have no idea.

20 MR. BOYNTON: Well, do you have anything  
21 specific at this point?

22 A. Not yet, but --

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1 Q. I don't know either. I'm not asking you  
2 to bind yourself. I'm asking you to tell me what  
3 you know now.

4 A. I'm not going to say I'm not going to  
5 travel.

6 MR. BOYNTON: Well, no, I don't think  
7 that's what you're being asked. She's asking do  
8 you have any plans right now.

9 A. No, I do not have any plans right now. I  
10 was thinking the rest of 2019.

11 MR. BOYNTON: The trial date has changed.  
12 It was originally January. Now there is no date,  
13 so that's why it's more open-ended than it would  
14 have been.

15 A. Okay.

16 Q. You have an official Virginia Beach office  
17 email address; is that right?

18 A. Correct.

19 Q. Do you also have personal email accounts?

20 A. Yes.

21 Q. And what are those?

22 A. rwilson31@cox.net, rawilson31@gmail.com.

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1 Q. Okay. And do you use one or both of those  
2 sometimes to communicate about City Council  
3 business?

4 A. Occasionally.

5 Q. Okay. And do you use both of them or just  
6 one of them?

7 A. One comes -- they both come into the same  
8 place.

9 Q. Okay.

10 A. So they merge.

11 Q. I understand.

12 Do you use your personal cellphone for  
13 both personal and official business?

14 A. Yes.

15 Q. Okay. And do you have a Virginia Beach  
16 computer or just your personal computer?

17 A. Personal.

18 Q. Okay. And do you sometimes use your  
19 personal computer for business purposes?

20 MR. BOYNTON: City business?

21 Q. For city business purposes?

22 A. Occasionally.

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1 Q. Okay. And do you have any cloud services,  
2 like Google Drive or Box.com or Dropbox?

3 A. I have Google Drive because I sit on the  
4 Development Authority, and they put our agenda  
5 there.

6 Q. Okay.

7 A. But that's the only thing I use it for,  
8 for city business.

9 Q. If you have a Word document or any sort of  
10 document that relates to your Virginia Beach City  
11 Council duties, where would you, typically, keep  
12 that document?

13 A. I don't.

14 Q. You don't have in your possession any  
15 documents related to your job as a Virginia Beach  
16 City Council person?

17 A. No. It comes through on my city account.  
18 We get tons of stuff printed that's sent to us.

19 Q. Where do you put those printed materials?

20 A. Everywhere. They're all over my house.  
21 We get lots of stuff.

22 Q. Okay.

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1 A. Every week (indicating).

2 Q. Okay.

3 A. A lot every week.

4 Q. And you have those documents in your home?

5 A. No. Not all of them. I mean, we have to  
6 get rid of the stuff. I wouldn't have a place to  
7 live if I kept them all.

8 Q. But you have some of them in your home?

9 A. So they come from the city, so there is  
10 nothing that is not on the city's stuff.

11 MR. BOYNTON: The point I think she's  
12 trying to establish --

13 MS. LANG: I understand.

14 MR. BOYNTON: Okay. I'm trying to  
15 facilitate.

16 MS. LANG: No thank you.

17 A. I can't keep all that stuff.

18 Q. Do you ever text message with the fellow  
19 City Council members?

20 A. Not city business, no.

21 Q. In general?

22 A. Yes.

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Conducted on October 3, 2019

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1 Q. Okay. Do you ever text message with  
2 constituents?

3 A. Yes.

4 Q. Okay. Do you have social media accounts?

5 A. Yes.

6 Q. Which kind?

7 A. Facebook.

8 Q. Twitter?

9 A. Yes. I don't -- I don't know how to use  
10 it, but I have it.

11 Q. Instagram?

12 A. Yes, but I don't know how to use that  
13 either.

14 Q. Do you have staff or volunteers that run  
15 those accounts for you?

16 A. Yes.

17 Q. Okay. And who are they?

18 A. James Frost.

19 Q. Okay. Is he a paid staff or a volunteer?

20 A. He's paid.

21 Q. Okay. Paid by your campaign?

22 A. Uh-huh.



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1 Q. Okay.

2 A. And a fellow named Darien McDaniel.

3 Q. Is he also paid?

4 A. Yes.

5 Q. By your campaign?

6 A. Yes.

7 Q. Okay.

8 A. But this is only during campaign season --

9 Q. Right.

10 A. -- that they have access.

11 Q. Right.

12 Do you keep a calendar?

13 A. Yes.

14 Q. On your phone?

15 A. On my phone.

16 Q. Do you ever write memos to yourself on  
17 your phone or elsewhere?

18 A. No.

19 Q. Ever take notes during City Council  
20 meetings?

21 A. We have a little tablet, and I'll write  
22 things there, but I usually throw them away.

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1 Q. What do you mean by tablet? Is it  
2 electronic or paper?

3 A. (Indicating)

4 MR. BOYNTON: Notepad.

5 Q. Notepad.

6 Okay. Do you have any of those in your  
7 possession at home?

8 A. Yes.

9 Q. Okay.

10 A. I'll give you an example. If someone  
11 comes -- when we have speakers, I'll write their  
12 names down. They came to speak before us.

13 Q. Yes.

14 A. That sort of thing.

15 Q. Are there any other means that you have  
16 for talking about city or campaign business that  
17 we haven't talked about yet?

18 A. Telephone.

19 Q. Telephone.

20 Who else is on your campaign staff right  
21 now?

22 A. Brian Kerwin.

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1 Q. And he's your manager, campaign manager?

2 A. No.

3 Q. What is his position?

4 A. He's a consultant.

5 Q. Who else?

6 A. Cole Trower, T-R-O-W-E-R.

7 Q. And what's his position?

8 A. That's a good question. He's not doing  
9 very much, so...

10 MR. BOYNTON: Okay then.

11 Q. What was he, theoretically, hired to do or  
12 paid to do?

13 A. He's supposed to be helping wherever you  
14 need help. You know, if you need to have signs  
15 put out or -- you know, he's not doing very much.  
16 I'm not very happy.

17 MR. BOYNTON: Okay.

18 Q. Is he paid on an hourly basis or how is he  
19 paid?

20 A. By the month.

21 Q. Who else?

22 A. That's it.

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Conducted on October 3, 2019

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1 Q. Okay. And James Frost, what is his  
2 position or role?

3 A. He takes pictures. He puts things on  
4 Facebook. I might get him to put a sign out  
5 tomorrow. Just what needs to be done.

6 Q. Okay. And what about --

7 A. Campaign --

8 Q. -- Darien McDaniel?

9 A. Darien, he's my campaign manager.

10 Q. He's your campaign manager?

11 A. Uh-huh.

12 Q. And when did campaign season begin and you  
13 brought these campaign individuals on?

14 A. July.

15 Q. July.

16 When did you announce that you were  
17 running for the Beach district?

18 A. Early May.

19 Q. You didn't have any staff on board when  
20 you did that?

21 A. No.

22 Q. Okay. And why did you decide to run for

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1 the Beach district?

2 A. I decided to run for the Beach district  
3 because there were three different Council members  
4 in a six-month period, and I felt that it was a  
5 very complicated district that needed my  
6 experience and to bring stability to the district.

7 Q. Okay. You were -- if you are not  
8 successful in this election you would still be in  
9 your role as an at-large member; is that correct?

10 A. Yes.

11 Q. And you're not actually up for election in  
12 that capacity until 2020; is that correct?

13 A. Yes.

14 Q. Okay. And if you are elected to the Beach  
15 district, what would happen to your position, the  
16 current position?

17 A. The Council would appoint someone.

18 Q. Okay. And you would vote with your other  
19 City Council members on who would be appointed to  
20 that position?

21 A. I have not made that decision yet.

22 Q. Okay. You would be entitled to vote?

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1 A. Yes.

2 Q. Okay.

3 MS. LANG: I'll mark Exhibit 1.

4 (Exhibit 1 was marked and  
5 attached to the transcript.)

6 Q. And you received this subpoena in this  
7 case; is that right?

8 A. I don't remember seeing this.

9 MR. BOYNTON: Others pages, maybe.

10 A. And I was contacted in an email about the  
11 deposition. We get in our package sort of a  
12 synopsis of the case. But I do not remember ever  
13 seeing this.

14 MR. BOYNTON: Why don't you do this? Why  
15 don't you leaf through the whole thing and see  
16 what's in it? And maybe that will help. The  
17 title is Subpoena to Produce Documents or  
18 Information. And, then, they have an attachment  
19 of all the documents they want.

20 A. I remember this (indicating).

21 Q. Okay. So you're referring to Exhibit A to  
22 the subpoena; is that correct?

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1 A. Yes.

2 Q. And you remember seeing this list of  
3 documents --

4 A. Yes.

5 Q. -- that we requested?

6 Okay. Can you walk me through what you  
7 did to search for responsive documents?

8 A. Excuse me?

9 Q. What did you do to find the documents that  
10 you ultimately gave to us in response to the  
11 subpoena?

12 MR. BOYNTON: If you continue to go  
13 through this, there are attachments. This is the  
14 package of response. We prepared that page for  
15 you. And, then, these are the documents that you  
16 provided.

17 A. Well, the things that were on the city  
18 site, they're things I left up to the city. And I  
19 did extensive searches on my personal accounts.

20 Q. Okay.

21 A. And I provided you what I could find.  
22 City information, we're required to maintain. But

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Conducted on October 3, 2019

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1 personal or campaign information, we are not  
2 required to maintain.

3 Q. And you searched your personal email  
4 accounts?

5 A. Yes, I did.

6 Q. Did you search your Google Drive?

7 A. I have nothing there. I only use it -- I  
8 only get -- I receive things from the Development  
9 Authority. Pretty much, that's it.

10 Q. So anything that was from the Development  
11 Authority that might be responsive to our request  
12 you didn't look for in the Google Drive?

13 A. No, I didn't because I don't really use  
14 it.

15 Q. Okay.

16 A. I receive information. That's how the  
17 Development Authority sends us our agenda.

18 Q. Okay. And did you look through your text  
19 messages?

20 A. Yes.

21 Q. And how did you go about doing that,  
22 manually or were you able to do a search? What



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1 did you do to find relevant text messages?

2 A. I did searches.

3 Q. Okay. Do you remember what terms you used  
4 for the searches?

5 A. No, I don't.

6 Q. Okay. Did you search your Facebook,  
7 Twitter, and Instagram accounts?

8 A. I don't know how to use -- I don't know  
9 how to use Twitter or Instagram. They really  
10 weren't -- they weren't active then either.

11 Q. Okay. But they had been active in the  
12 past, is that correct, during your 2016 campaign?

13 A. They could have been, but I don't do them.  
14 I mean, I don't know how to use them.

15 Q. You didn't ask your staff to search your  
16 social media accounts?

17 A. No, because I didn't have -- no. When  
18 did -- no.

19 Q. Okay. Did you search your calendar?

20 A. Yes.

21 Q. Okay.

22 A. My calendar goes blank after the day's

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1 passed.

2 Q. Okay.

3 A. It's electronic. And it goes blank.

4 Q. Your testimony is your calendar  
5 self-deletes every day?

6 A. Well, I don't know if every day. But if I  
7 go back to something -- I did this recently, too.  
8 Things weren't on the calendar, so it  
9 self-deletes.

10 Q. Did you search through the documents that  
11 are in your house that you testified to earlier?

12 A. Yes.

13 Q. You did?

14 A. I went through any of the campaign  
15 materials that I might have had.

16 Q. But not all of the city documents that you  
17 have in your possession?

18 A. No, because the city has copies of those  
19 things.

20 Q. Okay. You went through all of your  
21 campaign material?

22 A. The city documents and the campaign, those

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1 are two different entities.

2 Q. Okay. So for the campaign you did go  
3 through --

4 A. Yes.

5 Q. -- any hard copy materials you have?

6 A. I did. I provided you what I had.

7 Q. How about the notepads that you take notes  
8 on, did you look at those?

9 A. I don't maintain a lot of those. I just  
10 make -- I throw them away. They accumulate, and I  
11 throw them away. I just have, like, the last few  
12 weeks of -- they are disposed.

13 Q. Okay.

14 A. And they will not be used for campaign  
15 materials.

16 Q. During your 2016 campaign, did you use a  
17 campaign email address?

18 A. I did, but I didn't keep track of it  
19 myself.

20 Q. Who did?

21 A. I had a volunteer. But it was really not  
22 used very much.

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1 Q. Okay. Who was the volunteer who was in  
2 charge of that?

3 A. Her name is Deb -- I can't remember her  
4 last name -- Favron, F-A-V-R-O-N. Deb Favron.

5 Q. Who was your campaign manager last time  
6 around, in 2016?

7 A. I had a different campaign than I have  
8 this one, so I really -- I didn't have very much  
9 staff. I had a consultant, and I had volunteers.

10 Q. Who was your consultant?

11 A. Brian Kerwin.

12 Q. Did you consult with any of your campaign  
13 staff, past or present, about where campaign  
14 materials might be stored to search?

15 A. No.

16 Q. Okay. It's your campaign staff that run  
17 your social media accounts, though; is that  
18 correct?

19 A. I participate, too --

20 Q. Okay.

21 A. -- now. I mean, I'm running a different  
22 campaign where I've got more people involved this

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1 year.

2 Q. Okay. But I believe you testified earlier  
3 that primarily your social media accounts are run  
4 by your staff?

5 A. I post on them, too.

6 Q. Yes. I understand that you post on them,  
7 too. But is it true that your staff primarily run  
8 them?

9 A. Well, the Twitter, the Instagram, I have  
10 no idea how those are run, so I don't do anything  
11 with those.

12 Q. Okay. But you do have staff that have  
13 access to your Facebook account?

14 A. Yes.

15 Q. Okay. And you did not search any of your  
16 social media when you were responding to the  
17 subpoena?

18 A. No.

19 Q. Okay. And do you have, on your personal  
20 email or whatnot, most of your past campaign  
21 materials?

22 A. I've been campaigning since 1996. No.

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1 Q. Okay.

2 A. It's too much. And I've moved several  
3 times. My husband passed away. I've had to get  
4 rid of things, so I don't keep a lot of that  
5 stuff.

6 Q. Let's just focus on recent elections. In  
7 the 2012 and 2016, where do the past materials for  
8 those campaigns live?

9 A. 2012 is when my husband got sick. He was  
10 diagnosed October 10th, 2012, and for the next  
11 eight months I was busy taking care of him and  
12 moving. I really don't know where they are.

13 Q. Okay. How about 2016?

14 A. 2016, I -- most everything is electronic.  
15 And I sent you the -- I think I sent you the --  
16 Amelia Ross-Hammond and I did some events  
17 together. So I sent you what I had.

18 Q. Okay. You hinted at this just a moment  
19 ago. How long have you held your current position  
20 on City Council?

21 A. Since 2000.

22 Q. Did you have a city position -- a city

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1 position before that?

2 A. I had a position with the Schools.

3 Q. Okay. Were you on the School Board?

4 A. I was on the School Board for four years.

5 Q. Okay. So you ran for the School Board in  
6 1996?

7 A. That's correct.

8 Q. Okay. And, then, you ran for City Council  
9 in 2000?

10 A. Yes.

11 Q. Okay. And you've been in that same  
12 position ever since?

13 A. Yes.

14 Q. Okay. When you decided -- what led you to  
15 decide to run for office back in 1996 for the  
16 first time?

17 A. I was very involved in my children's  
18 school. And the principal really liked me.  
19 The -- I was on the -- not the Planning Commission  
20 but the Planning Council for the school. And the  
21 schools were having a pretty bad time right then  
22 because there was -- they were fiscally

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1 irresponsible and overspent \$12 million that they  
2 shouldn't have spent. And there was a Special  
3 Grand Jury, and nine of them, I believe, were told  
4 to resign or get indicted.

5 Q. Nine School Board members?

6 A. Yes.

7 Q. Okay.

8 A. So it looked like they needed somebody  
9 like me to step in and run.

10 Q. Okay.

11 A. And my children's principal asked me to  
12 run.

13 Q. And what led you to decide to run for City  
14 Council in 2000?

15 A. I liked the people. I liked the  
16 principals. I liked the teachers. I didn't like  
17 the Superintendent. And Harold Heischober was  
18 stepping down, and I just thought it was a good  
19 opportunity to run for City Council.

20 Remember that?

21 MR. BOYNTON: Uh-huh. That was a long  
22 time ago.



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1 Q. So I think you just answered this  
2 question. But when you ran, were you challenging  
3 an incumbent or was the incumbent --

4 A. No. It was an open seat.

5 Q. Okay. Have you had some challengers over  
6 the years in your races?

7 A. I've had more challengers than anybody  
8 else in the city.

9 Q. Who have been some of your challengers?

10 A. Who would you like? In '96 I had 24  
11 people run against me.

12 Q. Okay. Well, we can skip that one.

13 MR. BOYNTON: You don't have to list all  
14 those. We'll move forward.

15 A. I couldn't tell you who they are. In  
16 2000, there were six of them. I can't remember.  
17 2012, there was only one. That was the only time  
18 I only had one. Last year, there were -- last  
19 time, there were three others. 2008 -- gee. I  
20 can't remember.

21 Q. So --

22 A. I've had probably over 50 challengers.

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1 Q. In 2016, who was in the race alongside you  
2 for the at-large seat?

3 A. A fellow named Dane Blythe, a young woman  
4 named Courtney LaLonde, and another woman named  
5 Pam Witham, W-I-T-H-A-M.

6 Q. Were any of those individuals people of  
7 color?

8 A. No.

9 Q. Okay. In 2012, who was your challenger?

10 A. Kenny Golden.

11 Q. Who?

12 A. Kenny Golden.

13 Q. Okay. And who is Mr. Golden?

14 A. He was a retired naval officer.

15 Q. Okay. Is he a person of color?

16 A. No.

17 Q. Okay. Do you recall in 2004 who you ran  
18 against?

19 MR. BOYNTON: If you don't, you don't.

20 A. If I spent some time thinking about it I  
21 probably could.

22 Q. Okay.

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1 A. I've had a lot of challengers.

2 Q. Putting aside the many opponents you had  
3 in 1996, have you had any people -- persons of  
4 color run against you?

5 A. Yes. Georgia Allen ran against me. I  
6 think that was 2008.

7 Q. Okay. Anyone else?

8 A. I think so, but I can't remember their  
9 name.

10 Q. Okay. Have any of your races come close?

11 A. No.

12 Q. Okay. You testified that Brian Kerwin is  
13 working on your current campaign; is that right?

14 A. Yes.

15 Q. Has he -- since when has Brian Kerwin been  
16 consulting with you on campaigns?

17 MR. BOYNTON: This is the earliest date  
18 that she can --

19 Q. Earliest date that you've worked with  
20 Mr. Kerwin?

21 A. Atkinson to '96. Atkinson to 2000.  
22 Atkinson -- 2008.

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1 Q. And you mentioned a gentleman named  
2 Atkinson?

3 A. John Atkinson.

4 Q. And he was your prior consultant?

5 A. Well, he was my campaign manager.

6 Q. Okay.

7 A. He was a volunteer campaign manager.

8 Q. Okay. And how did you know Mr. Atkinson?

9 A. He was our City Treasurer.

10 Q. Okay.

11 A. You're, obviously, not from here.

12 MR. BOYNTON: He's the tax man.

13 MS. LANG: Actually, I have heard his  
14 name.

15 Q. How did you meet Mr. Kerwin?

16 A. I met Mr. Kerwin -- let's see. He ran for  
17 the School Board. He was a candidate for the  
18 School Board.

19 Q. When was that?

20 A. It might have been 2000. I'm not totally  
21 sure, but maybe 2000.

22 Q. Okay. And was he successful in that run?

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1 A. No.

2 Q. Mr. Kerwin has been a political consultant  
3 in Virginia Beach for a long time?

4 A. I guess -- what's your definition of a  
5 long time?

6 Q. I heard testimony earlier today that maybe  
7 longer than she had been alive. So about how long  
8 would you testify --

9 A. Well, he was -- he ran -- I would say  
10 2000. That was 19 years ago.

11 Q. Okay.

12 A. And he was not a consultant then.

13 Q. Okay.

14 A. So I think she's probably not quite that  
15 young.

16 Q. Okay.

17 MR. BOYNTON: We all in our mind are  
18 younger than we really are.

19 Q. Fair enough.

20 A. I can't -- you'd have to ask Mr. Kerwin  
21 when he became a consultant.

22 Q. Okay. But at least since 2008 when you

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1 started working with him?

2 A. Yes. Actually, I think he -- when did  
3 Bobby Dyer -- Bobby got elected in 2004. And he  
4 did Bobby Dyer's campaign.

5 Q. Okay. How did you end up working with  
6 Mr. Kerwin in 2008?

7 A. Ever since he was a School Board  
8 candidate. I like candidates and talking to them  
9 and sharing information. And we became friends  
10 when he was a candidate.

11 Q. Okay.

12 A. And I told him he was not running a very  
13 good campaign. He was running with Republican all  
14 over his stuff. And I said, You just got 40  
15 percent of the electorate mad at you.

16 Q. And Mr. Kerwin, did he approach you about  
17 working on your 2008 campaign or did you approach  
18 him?

19 A. I can't answer that. I have no idea. I  
20 mean, that's 11 years ago.

21 Q. Okay.

22 A. We've had lots of conversations.

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1 Q. Okay. And he's a paid consultant; is that  
2 right?

3 A. Yes.

4 Q. Okay. What is he currently being paid?

5 A. \$1,500 a month.

6 Q. And Mr. Kerwin often works for more than  
7 one City Council member during an election cycle;  
8 is that right?

9 A. Yes.

10 Q. Okay. So in 2016, do you recall who else  
11 Mr. Kerwin was working for during that cycle?

12 A. He worked for me. You'll have to ask him  
13 who else he worked for.

14 Q. Mr. Dyer? Mayor Dyer?

15 A. Probably, because he and Bobby have a  
16 long-term relationship, too.

17 Q. Okay. I imagine Mr. Kerwin doesn't work  
18 for candidates that are running against each  
19 other; is that correct?

20 A. Correct.

21 Q. Okay. So does that mean that he only  
22 works for one at-large candidate at a time?

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1           A. Well, when I run I'm the only at-large  
2 candidate.

3           Q. Okay. Because you run when the Mayor  
4 runs?

5           A. (Moved head up and down.)

6           Q. Okay.

7           A. So I can't answer what he does in the  
8 other years.

9           Q. Okay. And do you know how Mr. Kerwin  
10 decides who -- which candidates to work with?

11          A. I can't answer that. That's -- I mean --

12               MR. BOYNTON: Only if you know anything.

13          A. How can I answer what -- how he makes his  
14 decisions?

15          Q. I don't know. You have a personal  
16 relationship with him; is that correct?

17          A. Correct.

18          Q. Have you talked to him about how he  
19 chooses his -- who to work for?

20          A. I think probably people he likes.

21          Q. Okay. And does he have a particular  
22 political --



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1 A. Probably who can afford to pay him.

2 Q. Does he have a particular political  
3 ideology or philosophy?

4 A. He's a Republican.

5 Q. Okay. Does he only represent people who  
6 align with him politically?

7 A. I think he's had others that have not been  
8 Republican that he's worked for.

9 Q. Okay.

10 A. But I can't tell you who.

11 Q. Fair enough.

12 A. And we're supposed to be nonpartisan.

13 Q. Correct.

14 Do you know about how much money you spent  
15 on your campaign in 2016?

16 A. Maybe 140,000.

17 Q. Okay.

18 A. You'd have to look. That's a guess off  
19 the top of my head.

20 Q. Okay.

21 A. 125 to 140,000.

22 Q. Who are your major donors?

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1 A. I have a large number of donors.

2 Q. Who are some of your high dollar amount  
3 donors?

4 A. What do you consider high dollar?

5 Q. Over \$5,000.

6 A. Oh. I don't get many of those.

7 MR. BOYNTON: That narrows it  
8 substantially.

9 Q. I had to start somewhere. I'm going to go  
10 lower.

11 A. Maybe you've got it. Why don't you look?  
12 Because I don't have it in front of me. You're  
13 asking me off the top of my head.

14 Q. Sure.

15 Ocean Spirit?

16 A. Oh. So that was a PAC. Shannon Kane and  
17 I were doing a fundraiser together.

18 Q. Okay.

19 A. And so all the money for both candidates  
20 went into that particular PAC.

21 Q. Okay. Who ran that PAC?

22 A. Shannon's -- a guy that worked for

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1 Shannon. Myra -- Myron. Myron. Myron. But it  
2 was a PAC. It wasn't one person.

3 Q. And you had a joint fundraiser?

4 A. We had a joint fundraiser. We did it that  
5 way so all the money could go in and we could  
6 divide up the money.

7 Q. Okay. Acoustical Sheet Metal?

8 A. Yes. That's a German couple. They own a  
9 company called Acoustical Sheet Metal. They have  
10 since sold it. They just liked me.

11 Q. Okay. Franklin Johnston Group?

12 A. They build apartments.

13 Q. Okay. Breeden Companies?

14 A. That's -- they build shopping centers,  
15 apartments. They built the iFLY thing.

16 Q. Caliper, Inc.?

17 A. Caliper. They did temporary personnel.  
18 They were my personal neighbors and friends.  
19 Wait. Our children grew up together.

20 Q. Charles Guthrie?

21 A. He lived next door to me when I was  
22 eight-years-old.

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1 Q. Kotarides Developers?

2 A. Kotarides?

3 Q. Yes.

4 A. It's a gentleman that I never met  
5 in-person until Monday.

6 Q. And they're a developer? He owns a  
7 development company?

8 A. Uh-huh. All kinds of -- it's really  
9 funny. I had never met him.

10 Did you ever meet Kotarides?

11 MR. BOYNTON: I know Pete A. There are  
12 two Petes. We're getting beyond the scope here.

13 A. I never met him until Monday.

14 Q. SB Ballard Construction Company?

15 A. Steve Ballard has got a big construction  
16 company. He's built schools. He built Old  
17 Dominion. I've known Steve Ballard since the  
18 late -- since I was on the School Board.

19 Q. And Siebert Realty?

20 A. Who?

21 Q. Siebert.

22 A. Oh. Siebert Realty? They own a real

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1 estate company down in Sandbridge. And Jean  
2 Siebert, who just passed away this past year, was  
3 a personal friend. She and I traveled together.  
4 And we were both widows.

5 Q. Michael Sifen?

6 A. Mike Sifen?

7 Q. Sifen.

8 A. He builds shopping centers.

9 Q. And Bruce Thompson is also a developer in  
10 the city; is that right?

11 A. Uh-huh.

12 Q. Yes?

13 A. Yes.

14 Q. The Tidewater Builders Association, that's  
15 a group?

16 A. Yes.

17 Q. Okay. Armada Hoffler Enterprises?

18 A. They build and develop -- they built Town  
19 Center. But they build things all over, like  
20 Charlotte, Maryland, Baltimore.

21 Q. Elizabeth Atkinson? Is that

22 Mr. Atkinson's -- any relation to John Atkinson?

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1 A. His ex-wife.

2 Q. Okay.

3 MR. BOYNTON: So both sides like you.

4 Q. Louis Jones has contributed to your  
5 campaign; is that correct?

6 A. Yes, he has.

7 Q. Okay. Any other City Council members that  
8 have contributed to your campaigns over the years?

9 A. John Uhrin, Jim Wood. It's all there. I  
10 can't remember. Meyera.

11 MR. BOYNTON: Going back a long ways.

12 A. And Amelia Ross-Hammond.

13 Q. Mayor Sessoms?

14 A. Yes.

15 Q. Do you remember what year Amelia  
16 Ross-Hammond gave to your campaign?

17 A. We gave each other money in 2016.

18 Q. Okay. There she is.

19 A. Who, Meyera?

20 Q. Amelia Ross-Hammond.

21 A. Amelia. Yeah.

22 Q. When did you start fundraising for this

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1 most recent campaign?

2 A. I did a fundraiser in May.

3 Q. Who is MAJ Consulting?

4 A. He's my neighbor.

5 Q. Okay.

6 A. He's selling his business. He moved from  
7 Richmond, and he lives in my building, and he has  
8 cancer.

9 Q. I'm sorry to hear that.

10 A. And he's just a personal friend that  
11 really likes me. And he sold his business. He's  
12 got lots of money.

13 MR. BOYNTON: Nice problem to have, but  
14 certainly not --

15 A. And he has a Cavalier King Charles, like I  
16 do.

17 Q. Do you know what company Landing 888, LLC  
18 is? Contributed \$4,000.

19 A. Yes. Yes. Thank you. They are doing --  
20 connected with Global Links. They're doing --  
21 where the cables are coming in, they're creating,  
22 like, a condo hotel for the cables to come through

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1 for broadband.

2 Q. Okay. You lost me on cables until you  
3 said broadband.

4 MR. BOYNTON: There is a Transatlantic  
5 cable that lands in Virginia Beach.

6 Q. And Ben Davenport?

7 A. Another former Council member. There we  
8 go.

9 Q. Yeah.

10 Who is Gail Higgs?

11 A. Gail? Gail is an old-time -- long-time  
12 friend. She owned the Marina Shores and one of  
13 the Boatel things.

14 Q. Maybe we went over this already, but I  
15 don't remember. Ramon Breeden Investments?

16 A. That's the Breeden Company.

17 Q. Okay. Yusun Spitzer?

18 A. They own a company called GTS, and --  
19 cyber security. And they're building the big  
20 plant for these batteries. They also make  
21 rockets.

22 Q. Cool.



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1 A. Did you know that?

2 MR. BOYNTON: I heard about the batteries.  
3 I didn't know they made rockets.

4 A. Rockets, too.

5 Q. What about -- is this a city project, the  
6 plant with the batteries, or can you tell me about  
7 what the batteries are?

8 A. It's some kind of special battery that's  
9 got a spring. It's not like a battery here or a  
10 battery I can put in a flashlight. It's some kind  
11 of special batteries. And they're building a  
12 facility on Birdneck Road. They're going to  
13 create 1,100 jobs.

14 Q. Okay. Did they have any business with the  
15 city getting permits or whatnot for that plant?

16 A. I'm sure everybody does --

17 Q. Yeah.

18 A. -- when you're building.

19 Q. Okay. Hanger Holdings?

20 A. He's an attorney.

21 Q. What kind of attorney?

22 A. I think he does a lot of real estate

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1 closings. I'm not sure. I've never used him.

2 Q. Gerald Yagen?

3 A. He owns the Military Air Museum, the  
4 nonprofit museum that's down -- and, then, he also  
5 owns some schools, like Centura. He owns, like,  
6 private technical schools.

7 Q. Okay. With the exception of Amelia  
8 Ross-Hammond, are any of the individuals we went  
9 over people of color?

10 MR. BOYNTON: People who -- I'm trying to  
11 understand the question.

12 Q. People who identify as African American or  
13 as Latino or Asian American?

14 MR. BOYNTON: Are you asking about  
15 campaign donors? That's what I'm --

16 Q. Yes. The donors that we just reviewed.

17 A. Well, you didn't ask me about Hassan  
18 Barode. He's Indian. He gave me money.

19 Q. Okay. Yeah. Of the individuals we've  
20 spoken of?

21 A. He gave me money this year. And you  
22 didn't mention him. He gave me money. I mean,

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1 you're asking about minorities.

2 Q. And I appreciate you giving me that  
3 additional information.

4 A. Yes.

5 Q. I don't -- for the sake of your time, I  
6 can't go through --

7 A. The ones that you named, they are not  
8 African American, no.

9 Q. Okay. Are there any other donors that you  
10 can think of that identify as minority?

11 A. I had a fundraiser yesterday, and Carla  
12 Bailey gave me money. She is African American.

13 Q. During the 2018 election there appears to  
14 have been an incident in which some campaign  
15 officials or volunteers at one of the polling  
16 locations was giving out different slates of  
17 candidates depending on the race of the voter.  
18 Are you familiar with this incident?

19 A. I did hear about it, yes.

20 Q. Okay. Who did you hear about it from?

21 A. This little friend of mine who does  
22 volunteer work called me, Lucas Anderton.

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1 Q. Okay. And when did he call you about it,  
2 the day of or later?

3 A. He thought it was at the courthouse.

4 Q. Okay.

5 A. He was very upset about it. And there  
6 were different color ballots. And depending on  
7 who walked up, they gave them a different ballot.

8 Q. That is what I've heard. And we do have  
9 some photos of the individual ballots.

10 Are you familiar with the group Friends of  
11 the Elephant?

12 A. Yes, I am. A little bit.

13 Q. I'm sorry?

14 A. A little bit, yes.

15 Q. Are you aware Friends of the Elephant is  
16 the group that --

17 A. Yeah. Gary Byler.

18 Q. And they created these different flyers?

19 A. I think so.

20 Q. Okay. Has anyone spoken, to your  
21 knowledge, to Mr. Byler about these flyers?

22 A. I have no knowledge of that.

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1 Q. You haven't?

2 A. No.

3 Q. Do you know Mr. Byler?

4 A. Yes.

5 Q. Are you friendly with Mr. Byler?

6 A. We know each other.

7 Q. Okay.

8 A. That's about it.

9 Q. Outside of this particular incident, are  
10 you aware of any other remarks or incidents  
11 related to race that have come up in recent City  
12 Council elections?

13 A. No. Not off the top of my head.

14 Q. Did Amelia Ross-Hammond ever talk to you  
15 about any issues related to race in running for  
16 elections?

17 A. She told me one time as she was starting  
18 to run that some people in the African American  
19 community didn't want her to run because she had  
20 too much education.

21 Q. Did she mention who?

22 A. I don't recall.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

60

1 Q. Okay. Did you ever speak to Louisa  
2 Strayhorn about her experience running as an  
3 African American in Virginia Beach?

4 A. No.

5 Q. Okay. Did Amelia Ross-Hammond talk to you  
6 about any other difficulties she may have  
7 encountered as an African American running --

8 A. From --

9 Q. -- in Virginia Beach?

10 A. From the white community or --

11 Q. From anyone.

12 A. No. Not that I recall.

13 Q. Okay. Did -- in 2018 you supported  
14 Sabrina Wooten for City Council?

15 A. I did.

16 Q. How did you meet Sabrina Wooten?

17 A. I heard about her. I'm always good --  
18 interested in good candidates, and so I contacted  
19 her and asked to meet her. At that point she had  
20 already filed.

21 Q. Right.

22 And how did you hear about her?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

61

1           A. I think my little friend Lucas told me  
2 about her.

3           Q. Okay. How do you know Lucas? His name is  
4 Lucas Anderton?

5           A. Yes. Lucas is a very bright young man.  
6 He goes to American University. He was helping  
7 with Bob McDonnell's restoration fund. So I met  
8 him through that. And he's just a delightful  
9 young man, very interested in politics. And he  
10 told me about Sabrina. He said she was  
11 impressive, so I reached out to meet her.

12          Q. Does Lucas identify as a Republican?

13          A. No. He's a Democrat. He's definitely a  
14 Democrat. He's working for Nancy Guy's campaign.

15          MR. BOYNTON: I knew I heard that name  
16 somewhere.

17          Q. Do you identify with one party or another?  
18 I know that you don't as a City Council member.

19          MR. BOYNTON: Give her a moment just to  
20 see what this is.

21          A. I've got something.

22          MR. BOYNTON: Sorry.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

62

1           A. I'm sorry. I've got to take care of  
2 something for a second.

3           MS. LANG: Let's go off the record.

4           (Off the record)

5           Q. So I believe before we went off the record  
6 you had testified that Mr. Anderton had probably  
7 let you know about Sabrina Wooten's candidacy, and  
8 you were interested so you reached out to her to  
9 talk to her; is that correct?

10          A. That's correct.

11          Q. All right. You can open up Exhibit 1.

12          MR. BOYNTON: It's the same as this. I'm  
13 going to keep this for you, if that's okay. I  
14 have another copy in here. I assume you need  
15 those notes.

16          So what page are we looking at?

17          MS. LANG: I guess the first email, which  
18 is on August 6th, 2018.

19          MR. BOYNTON: First in time?

20          MS. LANG: First in time, yes.

21          MR. BOYNTON: August 6, 2018. So there it  
22 is.



Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Q. Then I guess I'll ask first, this was not  
2 your first communication with Ms. Wooten; is that  
3 right?

4 A. You mean by email or --

5 Q. Generally.

6 A. No. I had already met with her.

7 Q. So how did you initially reach out to  
8 Ms. Wooten? Was it by email or by phone?

9 A. I think I called her. I mean, I don't  
10 remember. It's been a long time. I mean, I think  
11 I called her.

12 Q. Okay. And, then, when was the first time  
13 you met with her in-person?

14 A. I don't remember the date.

15 Q. Approximately. Did you meet for coffee?

16 A. No. I had her come to my office.

17 Q. She came to your office?

18 A. Uh-huh.

19 Q. And was that sometime last summer?

20 A. Uh-huh.

21 Q. Okay. And about how many times did you  
22 meet with Ms. Wooten personally during her

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 campaign, so during the year of 2018?

2 A. I have no idea.

3 Q. Less than five? More than 10?

4 A. I don't know. I don't know.

5 Q. I understand that. But the deposition,  
6 it's usually --

7 MR. BOYNTON: Without speculating, you can  
8 give your best estimate.

9 A. I don't know.

10 MR. BOYNTON: Okay.

11 Q. Did you meet with her more than once?

12 A. Yes.

13 Q. Okay. More than two times?

14 A. Yes.

15 Q. Okay. More than 20 times?

16 A. Unlikely.

17 Q. Okay. Did you appear at any of her  
18 campaign events?

19 A. Yes.

20 Q. How many?

21 MR. BOYNTON: All of these are to your  
22 best recollection.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

65

1           A. Campaigns are intense. There's a lot of  
2 things that happen. I know she had an event at  
3 this place on 16th Street that I came and went to  
4 that.

5           Q. Okay.

6           A. There were forums that all the candidates  
7 were at that I attended. I just don't remember.

8           Q. Okay. What did you and Ms. Wooten discuss  
9 on your first phone call and first in-person  
10 meeting?

11          A. I wanted to meet her, and so she came in,  
12 and we talked about her background, her résumé,  
13 not -- we talked about her résumé and what kind  
14 of -- you know, what she had done, her  
15 experiences.

16          Q. And did you talk at all about her platform  
17 or the issues she cared about with respect to  
18 Virginia Beach City Council?

19          A. No.

20          Q. Okay. Did you ever talk about her  
21 platform or her positions on issues in Virginia  
22 Beach City Council?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

66

1           A. Well, she was on the Minority Business  
2     Council, so I made some assumptions that she would  
3     be a pro-business type candidate.

4           Q. But you never actually spoke to her about  
5     policy issues; is that correct?

6           MR. BOYNTON: This is in the campaign  
7     season?

8           Q. In the campaign season.

9           A. I --

10          MR. BOYNTON: Just to the extent you  
11     remember.

12          A. I just -- I don't recall.

13          Q. Okay. And it appears here that you helped  
14     her put together this résumé-looking piece of  
15     paper?

16          A. Yes. She sent me -- I had her -- looked  
17     at her bio. And she was going to be meeting with  
18     prospective donors, so I helped her organize it so  
19     that it would be easy when you sit down with  
20     someone and they could quickly get an idea of who  
21     she was at a glance.

22          Q. Okay.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 A. So I took her bio, and I rewrote it --

2 Q. Okay.

3 A. -- to be helpful.

4 Q. Okay. If you look at one page earlier,  
5 which is the next email in time, it's Ms. Wooten  
6 thanking you for your contribution; is that right?

7 A. Uh-huh.

8 Q. How much did you contribute to --

9 A. \$250.

10 Q. Okay. And when did you announce your  
11 endorsement of Ms. Wooten?

12 A. I don't know.

13 Q. Who else did you endorse in the 2018  
14 election?

15 A. I stayed out of the Mayor's race. I  
16 endorsed Dee Oliver, Louis, Jim Wood, John Uhrin.  
17 Who else was there?

18 MR. BOYNTON: At-large.

19 A. I just did Dee.

20 Q. Okay. And did you make those  
21 announcements through Facebook or through a press  
22 release or by some other means?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

68

1           A. No press release. I told them personally.  
2           I may have put something on Facebook that I liked  
3           them.

4           Q. And did you appear at campaign events for  
5           each of those individuals?

6           A. Louis didn't really have any campaign  
7           events. John Uhrin had something at Croc's, and I  
8           went to that. I already told you about the one  
9           for Sabrina. Jim Wood had his kickoff at the Town  
10          Center. I went to that. Who else?

11          Q. Ms. Oliver?

12          A. Yes. She had something at Kelly's.

13          Q. Did you donate to those campaigns, as  
14          well?

15          A. Yes.

16          Q. Each of them?

17          A. And 250, as far as I remember.

18          Q. Okay. And, then, it looks like in the  
19          next email in time you had helped pick up some  
20          contributions -- collect some contributions for  
21          Ms. Wooten; is that right?

22          A. Yes. Yes.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Q. Can you tell me about that?

2 A. Which one are you looking at?

3 Q. I'm looking at the October 15th email.

4 And Ms. Wooten thanks you, and she came to pick up  
5 contributions from your office, and thanks you for  
6 assisting with those contributions.

7 A. Yeah. I mean, I helped her raise money.

8 Q. Okay. Did you introduce her to donors?

9 A. I did.

10 Q. Okay. Which donors did you introduce her  
11 to?

12 A. I introduced her to Ray Breeden. I  
13 introduced her to Will Sessoms and Lynwood Branch.  
14 I introduced her to Bruce Thompson. Probably  
15 others, I'm sure.

16 Q. And how did it come to be that you had  
17 contributions for her at your office?

18 A. Some people gave money through me.

19 Q. Okay. So you solicited contributions for  
20 her from other donors?

21 A. Uh-huh.

22 Q. About how many, do you think?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

70

1 A. I have no idea. I don't remember.

2 Q. Okay. Why did you want to support  
3 Ms. Wooten's campaign?

4 A. She was an impressive woman. She had two  
5 master's degrees. She was working on her Ph.D.  
6 She volunteers as a police chaplain for our city,  
7 which is pretty impressive. And she was on the  
8 Minority Business Council. And I liked her when I  
9 met her.

10 Q. Did you meet with Eric Wray or anyone else  
11 that was running for that seat?

12 A. Well, I knew Eric Wray. I didn't need to  
13 meet with him.

14 Q. Okay. And I can't recall who else was  
15 running in that seat.

16 A. Conrad.

17 Q. Do you know him?

18 A. Well, I've seen him.

19 Q. So is it fair to say that you --

20 A. I thought that Sabrina was a better  
21 candidate than the other two.

22 Q. Okay. Do you know who else supported



Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Ms. Wooten's campaign that was also on the  
2 Council?

3 A. I can't speak to that.

4 Q. Did you -- you said you introduced her to  
5 Mayor Sessoms; is that right?

6 A. That's true.

7 Q. Did you introduce her to any other City  
8 Council members?

9 A. I could have. I don't know. There is a  
10 lot going on. I don't remember. I could have,  
11 but I don't remember.

12 Q. Okay. You did not support Aaron Rouse; is  
13 that correct?

14 A. I liked Aaron. I met with him.

15 Q. But you supported Dee Oliver?

16 A. Uh-huh.

17 Q. How do you know Dee Oliver?

18 A. She's on the Planning Commission.

19 Q. Okay. And that's how you knew her?

20 A. Uh-huh.

21 Q. Okay.

22 MR. BOYNTON: Just yes or no. Uh-huh is

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 not --

2 A. Yes. Sorry.

3 MR. BOYNTON: No worries.

4 Q. Why did you decide to support Ms. Oliver?

5 A. I thought she was a good candidate.

6 Q. Based on her experience? Based on her  
7 positions on the issues, her political ideology?

8 A. Her experience. I liked her as a person.  
9 She's also -- had gone through widowhood like I  
10 had. She's remarried. She seemed very bright.  
11 She'd been serving on the Planning Commission.  
12 She seemed to know a lot. I thought she'd make a  
13 good Council member.

14 Q. Have you ever recruited or encouraged  
15 anyone else to run for City Council?

16 MR. BOYNTON: Object to the form of the  
17 question.

18 You can answer to the extent that you  
19 understand her question. I'm just objecting to  
20 the form of the question.

21 A. Can you rephrase that, please?

22 Q. Sure.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Have you ever recruited or encouraged  
2 anyone to run for City Council?

3 A. I wouldn't say I've recruited, no.  
4 That's -- but I'm sure I've recruited -- I've  
5 encouraged people to run.

6 Q. Can you think of anyone in particular that  
7 you've encouraged to run?

8 A. Well, sometimes it's after they've  
9 announced or they've shown an interest.

10 I can remember Jim Wood, meeting with him,  
11 that he was interested in running, and I  
12 encouraged him to run.

13 Q. Anyone else?

14 A. I'm trying to think. Are you talking  
15 about for the first time candidates?

16 Q. Not necessarily.

17 A. I encouraged Amelia.

18 Q. To run for reelection?

19 A. Uh-huh.

20 Q. Okay. Did you encourage her in her first  
21 election?

22 A. No. I think I, sort of, stayed out of

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 that election. I didn't get involved with  
2 candidates.

3 Q. Did you support Amelia when she was  
4 running against Jessica Abbott?

5 A. Let me go back to Amelia again. I sort of  
6 stayed -- I encouraged her because I thought she  
7 was a good candidate, but I didn't get -- I didn't  
8 do a lot. But I did encourage her. That's how I  
9 knew about her meeting with the group that said  
10 she was too well-educated.

11 Q. Okay. But you didn't endorse her in that  
12 race?

13 A. No. I stayed out of it.

14 Q. Okay. Why did you decide to stay out of  
15 that race?

16 A. Probably because I was on the ballot, too.

17 Q. Did you endorse anyone in 2016?

18 A. Normally, when I run I don't.

19 Q. In 2016, did you endorse anyone?

20 A. Well, I endorsed Amelia because we ran  
21 together. We did our kickoff together.

22 Q. Right.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

75

1 Other than your kickoff together with  
2 Amelia Ross-Hammond, did you support anyone else  
3 in the 2016 election?

4 A. Well, there is different types of support.

5 Q. Did you endorse anyone else?

6 A. So that was Bobby who was unopposed,  
7 Amelia, Shannon Kane.

8 Q. Okay. To your knowledge, have any Latino  
9 or Hispanic candidates ever been elected to City  
10 Council?

11 A. I've actually never known any to run.

12 Q. Besides Ron Villanueva, do you know of any  
13 other Asian candidates that have run or been  
14 elected to City Council?

15 A. He's the only one I know of.

16 Q. Is it true during your tenure that no  
17 African American has ever won reelection?

18 A. I guess so.

19 Q. Do you have any sense why that might be?

20 MR. BOYNTON: Object to the form of the  
21 question.

22 You can testify to your own understanding

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 or knowledge.

2 A. I think Amelia lost because of the light  
3 rail issue. The rest of us took the stand that we  
4 would listen to the voters and abide by the  
5 referendum, and Amelia did not. She supported  
6 light rail no matter what the voters said.

7 Q. I think we may have gotten cut off on this  
8 question earlier. I know that City Council is  
9 nonpartisan. Do you identify with any particular  
10 political party?

11 A. I'm Republican, yeah, but I work with  
12 everyone.

13 Q. No doubt.

14 Prior to --

15 A. And Amelia was a Democrat.

16 Q. Right.

17 A. And I helped her.

18 Q. Prior to your run for School Board, were  
19 you ever appointed to any commissions or --

20 A. No.

21 Q. -- other public -- do you serve on any --  
22 during your time as a City Council member, have

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 you served on specific commissions or committees  
2 or other similar roles?

3 A. Other than the city?

4 Q. Other than as City Council member.

5 A. Yes.

6 Q. Okay. What are some of those roles?

7 A. I served on the Fair Housing Board with  
8 the state.

9 Q. Are you still on the Fair Housing Board?

10 A. No.

11 Q. What period was that?

12 A. I served for six years. I can't remember  
13 the dates. It's been since 2010, but I don't  
14 remember the dates.

15 Q. Okay. What other --

16 A. The -- another gubernatorial position with  
17 the local government, Advisory Council for the  
18 Chesapeake Bay.

19 Q. Are you still on that?

20 A. No.

21 Q. And when was that? How many years?

22 A. This is all written down on my bio, which

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 I don't have.

2 Q. I understand.

3 A. I was really glad to get off of it because  
4 you had to go to meetings everywhere, like  
5 Pennsylvania.

6 MR. BOYNTON: Just your best guess.

7 Q. What other --

8 A. I probably served on it four to six years.

9 Q. Okay. And what other --

10 A. I currently serve on the Broadband  
11 Advisory Commission with the state, another  
12 gubernatorial position.

13 Q. Okay.

14 A. It's my second year.

15 Q. Any others?

16 A. I was president of the Virginia Municipal  
17 League.

18 Q. Any others?

19 A. I mean, I've done a lot of things.

20 Q. It seems like that.

21 A. You should just see my bio.

22 Q. Fair enough.



Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 A. I have a two-page bio.

2 Q. Are you currently on any kind of city  
3 commissions or committees?

4 A. I have a whole slew of them.

5 Q. Which ones are you on?

6 MR. BOYNTON: I can't avoid the series of  
7 questions. It's part of the case. It's  
8 unfortunate that it takes time.

9 A. I'm on the HRPDC.

10 Q. What's that?

11 A. Hampton Roads Planning District  
12 Commission. The Housing Advisory Commission,  
13 Historic Preservation Commission, the Development  
14 Authority. I'm liaison to some -- you know, there  
15 is a whole bunch of stuff. There is a lot of  
16 things.

17 MR. BOYNTON: I'm hoping that in finding  
18 your bio and emailing it to her I might be able to  
19 short-circuit over this.

20 A. I can pull up the bio.

21 Q. No. That's okay. Thank you.

22 MR. BOYNTON: That's okay. She asked you

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

80

1 not to.

2 A. Okay. If you want the real information,  
3 there you go.

4 Q. Do you serve on any committees related to  
5 policing?

6 A. No.

7 Q. Okay. Outside of Virginia Beach City  
8 Council, have you endorsed other Virginia Beach  
9 elected positions, like other constitutional  
10 officers that are running in Virginia Beach  
11 elections?

12 A. Since when?

13 Q. Ever. I mean, this is a yes or no  
14 question.

15 A. Yes.

16 Q. Okay. In 2018, who did you endorse  
17 outside of City Council?

18 A. School Board members.

19 Q. Okay. Anyone else?

20 A. No, because that's the only -- it's only  
21 local elections --

22 Q. Okay.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 A. -- and national elections.

2 Q. Okay. And what about 2016?

3 A. Again, that was when I ran myself, so I  
4 stay out of other people's races.

5 Q. Okay.

6 A. Other than what we talked about.

7 Q. Okay. And have you ever supported,  
8 donated, or volunteered for any state level  
9 candidates?

10 A. Yes.

11 Q. Who?

12 A. Glenn Davis.

13 Q. Who is that?

14 A. He's a Delegate.

15 Q. Okay. Anyone else?

16 A. Frank Wagner. He was a Senator.

17 Q. Anyone else?

18 A. That I've supported? I've supported Barry  
19 Knight. I supported Chris Stolle. I supported  
20 Bob Tata. That's a good start.

21 Q. Okay. Are any of those individuals  
22 minority?

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 A. Oh. Ron Villanueva when he ran.

2 Q. Other than Ron Villanueva?

3 A. Not that I recall.

4 Q. Are you supporting -- never mind. The  
5 only 2019 special election is you, so...

6 MR. BOYNTON: She's supporting herself.  
7 She's all in on that one.

8 Q. Have you ever supported, donated, or  
9 volunteered for federal level candidates?

10 A. Probably Thelma Drake.

11 Q. Who is that?

12 A. She was a Congresswoman. Scott Rigell.  
13 The state one, you also mentioned Bob McDonnell  
14 who became Governor.

15 Q. Is that it?

16 A. Ben Loyola. He ran for Congress in the  
17 primary.

18 Q. Have you ever donated at the Presidential  
19 level?

20 A. No.

21 Q. Okay. Outside of voting, have you ever  
22 volunteered or supported at the Presidential

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 level?

2 A. No.

3 Q. From when you moved here to Virginia Beach  
4 when you were five-years-old through today, has  
5 the minority population in Virginia Beach grown  
6 quite a bit?

7 A. Yes.

8 Q. Do you know what the demographics of your  
9 district are?

10 A. I'm at-large.

11 Q. Right. Thank you.

12 Do you know what the demographics of the  
13 Beach district are?

14 A. No.

15 Q. Okay. Do you know what the overall  
16 demographics of Virginia Beach are now?

17 A. For which race?

18 Q. Overall. For an at-large race, the City  
19 of Virginia Beach --

20 A. No, but --

21 Q. -- today?

22 A. Minority, I mean -- African Americans,

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

84

1 Asians?

2 MR. BOYNTON: Not campaign race. Which  
3 ethnicity.

4 Q. I understand. For which ethnicity? So  
5 I'm asking for the demographics. So what's your  
6 understanding of the percentage white, African  
7 American, Asian, Latino, to the best -- I know  
8 you're not going to know.

9 A. I don't know a breakdown of all of that.  
10 I mean, I think the African Americans, probably 25  
11 percent.

12 Q. Okay.

13 A. It's a guess.

14 Q. Are there neighborhoods that you would  
15 classify as predominantly of historically black  
16 neighborhoods?

17 A. Probably L&J Gardens.

18 Q. Burton Station?

19 A. So it's not really a true neighborhood  
20 anymore.

21 Q. It used to be?

22 A. Yes.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Q. Did it used to be a predominantly African  
2 American neighborhood?

3 A. Yes.

4 Q. Is that neighborhood fairly rundown now?

5 A. No. It's been redeveloped.

6 Q. But there is hardly anyone left who lives  
7 there? Is that what you're saying?

8 A. I don't -- it's not in my -- I really  
9 don't know. I can't answer that.

10 Q. Okay. Seatack?

11 A. Seatack, yes, but it's got a lot of white  
12 population, too. It's mixed.

13 Q. Okay. In 2011, do you know who's doing  
14 the redeveloping in Burton Station?

15 A. No.

16 Q. Okay. In 2011 and 2012 the City Council  
17 redistricted the seven residency districts; is  
18 that correct?

19 A. We do it every 10 years.

20 Q. Okay. And you were on City Council for  
21 that; is that correct?

22 A. Yes.

Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 Q. That's the only one -- is that the only  
2 redistricting that you've done on Council?

3 A. No. We did it in the early 2000s. Same  
4 thing.

5 Q. And you're preparing to do it again  
6 post-2020?

7 A. Yes.

8 Q. Okay. You've had at least one meeting  
9 with some folks about the 2020 census; is that  
10 correct?

11 A. Yes.

12 Q. Okay. Who did you meet with?

13 A. Someone came before us to speak.

14 Q. Was it someone from the federal  
15 government?

16 A. I don't remember who it was.

17 MR. BOYNTON: I couldn't tell you if I  
18 knew. And I don't know.

19 A. Somebody came before us. We get lots of  
20 briefings.

21 Q. Was that at a regularly scheduled --

22 A. It was to encourage us to help with the --



Transcript of Rosemary Wilson  
Conducted on October 3, 2019

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1 I think they wanted somebody from Council to  
2 participate on the committee.

3 Q. There was going to be a committee?

4 A. Uh-huh.

5 Q. Has anyone volunteered to do that from  
6 Council?

7 A. I think so, but I don't know who it is.

8 Q. It's not you then?

9 A. It's not me. I've got enough on my plate.

10 Q. And in 2011, can you walk me through the  
11 process that City Council went through?

12 A. No, I can't. We have a committee that  
13 does it. I did not serve on the committee. And  
14 they came forward with recommendations.

15 Q. So who was on the committee in 2011-2012?

16 A. Most likely, Louis Jones. And I don't  
17 remember who else.

18 Q. Okay. Outside of Council members, are  
19 there others who participate in the committee?

20 A. I don't know. It's not a committee that  
21 I'm involved in.

22 Q. So the committee at some point had to go

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1 to City Council with recommendations; is that  
2 correct?

3 A. That's true.

4 Q. And what were the recommendations?

5 A. Whatever we passed.

6 Q. Okay. Was there just one recommendation  
7 or --

8 A. As far as I know.

9 Q. Okay.

10 A. I mean, you're talking about 10 years. I  
11 don't know.

12 Q. Do you recall there being any debate about  
13 which map to select?

14 A. No, I don't.

15 Q. Okay. Is it your basic understanding,  
16 then, that the members of this committee, Louis  
17 Jones and someone else, came up with a proposed  
18 redistricting map and that was the map that was  
19 passed by City Council? Is that -- is that your  
20 understanding?

21 A. Most likely.

22 Q. Okay. Are you aware that community

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1 members had asked that one of the districts be a  
2 majority minority district?

3 A. From what I can remember, we couldn't  
4 figure out where it could be that type of district  
5 because there is not a concentration in any  
6 particular district.

7 Q. But you remember that that was a request?

8 A. Well, it was looked at, but there wasn't a  
9 district that qualified.

10 Q. Right. I'm asking a different question  
11 for now. We can talk later about what was done.  
12 But, first, who made requests that that be looked  
13 at?

14 A. I don't know.

15 Q. But you recall that people did ask for  
16 that to be looked at?

17 A. I don't know.

18 Q. Okay. But it was something that was  
19 explored by the City Council?

20 A. Yes.

21 Q. Okay. And your recollection is that that  
22 was difficult or not possible to do?

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1 A. Correct.

2 Q. Okay. Are you familiar with an attempt to  
3 create a large -- either majority minority  
4 district or at least a high concentration of the  
5 minority population in Centerville?

6 A. No.

7 Q. Were there any public meetings about the  
8 redistricting process?

9 A. I don't remember.

10 Q. Okay. Looking forward to 2020, do you --  
11 does the committee -- does the Council plan to  
12 proceed in the same manner, by creating a  
13 committee?

14 A. I can't answer that question because I  
15 don't know.

16 Q. Do you know if the City Council hired a  
17 consultant to work on the redistricting?

18 MR. BOYNTON: Which one?

19 Q. The 2011-2012 redistricting.

20 A. I don't remember. Probably, but I can't  
21 confirm it.

22 Q. Okay. Are you familiar with Kimball

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1 Brace?

2 A. No.

3 Q. Have you ever heard his name before?

4 A. No.

5 Q. Okay.

6 A. Not that I can remember.

7 Q. Okay. So it's your testimony that you,  
8 basically, had nothing to do with the  
9 redistricting process, other --

10 A. That's correct. Other than voting on what  
11 was recommended.

12 Q. And you just voted yes on what was  
13 recommended?

14 A. Yes.

15 Q. Did you have any specific criteria when  
16 you were determining whether or not to vote yes on  
17 the map that was presented?

18 A. Presentation was a good one, and it looked  
19 like what they wanted to present was the best  
20 alternative -- you know, the best thing, and so I  
21 voted yes --

22 Q. Okay.

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1 A. -- on the recommendations.

2 Q. Okay. Outside of talking to your  
3 attorneys about this lawsuit, have you had any  
4 conversations with anyone else about the  
5 possibility of changing the electoral system from  
6 an at-large system to single-member districts?

7 MR. BOYNTON: And to the extent those  
8 conversations are private conversations with other  
9 City Council members, that would potentially  
10 implicate legislative privilege. But beyond that,  
11 it's okay to answer if you had public  
12 conversations or conversations outside of City  
13 Council.

14 A. It's kind of funny because when I ran in  
15 1996 it was on the ballot whether to go -- to get  
16 what we had or to go to a ward system. And that  
17 was in 1996.

18 Q. Yes.

19 A. So it's something that's come up from time  
20 to time.

21 Q. And it was rejected in 1996?

22 A. It was.

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1 Q. Okay. Do you know by what margin?

2 A. No. I don't know.

3 Q. Did you support that change in 1996?

4 A. I was running for election. I was just  
5 concentrating on myself.

6 Q. Okay.

7 A. I had 24 people in my race.

8 Q. Before -- so in more recent years have you  
9 talked to anyone about the possibility of changing  
10 the electoral system?

11 A. I probably have. It comes up from time to  
12 time. And I can't tell you who. Sometimes I  
13 don't remember who I talked to this morning.

14 Q. Did you talk to -- have you ever spoken to  
15 Ms. Abbott about it?

16 A. No.

17 Q. Did Ms. Abbott raise it in a 2018 public  
18 session?

19 A. She's raised it. I can't tell you when.

20 Q. Okay. Did you speak to that issue when it  
21 was raised in public session?

22 A. Not that I remember.

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1 Q. Okay. What is your position on whether or  
2 not the electoral system should be changed?

3 A. Do I have to answer this?

4 MR. BOYNTON: It's a political question.

5 Q. Yes.

6 MR. BOYNTON: If you have a position, you  
7 can say it. If you don't have a position --

8 A. I really don't have a position at this  
9 point.

10 Q. To be clear, it's not really whether or  
11 not you have a public position. To the extent you  
12 have a position or an opinion, you need to share  
13 it.

14 A. An opinion is not a fact.

15 Q. Right. But you are required under oath to  
16 tell me what your opinions are regardless of  
17 whether or not they're facts or not.

18 MR. BOYNTON: It may ultimately prove  
19 totally irrelevant, but, unfortunately, in  
20 depositions the standard is very low as to asking  
21 questions about, you know, your background and  
22 experience.



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1 A. I have mixed feelings.

2 Q. Okay. And what are those mixed feelings?

3 A. I think there is pros and cons on both  
4 sides.

5 Q. Okay. And what are some of the pros?

6 A. I'm really getting tired. I'm really  
7 getting tired.

8 MR. BOYNTON: I get it. It's just an  
9 exercise we have to go through. I wish it were  
10 different, but do the best you can to answer the  
11 question and we'll get out of here as quick as we  
12 can.

13 Q. Depositions can go as long as  
14 seven-and-a-half hours by rule, Ms. Wilson. So I  
15 am doing my best, but this is the nature of the  
16 task.

17 A. Well, the -- sometimes the public doesn't  
18 understand the hybrid system that we have. So  
19 that's probably a pro for it.

20 A con is I think that you have 11 people  
21 accountable to the voter.

22 So there is a pro and a con for you.

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1 Q. Okay. What are some other pros and cons?

2 A. I think that's enough for now.

3 Q. That's not how this works, Ms. Wilson.

4 MR. BOYNTON: If you have something in  
5 mind, you can testify. If you don't have  
6 something in mind, that's a different thing.

7 A. I really don't have anything in mind.

8 MS. LANG: Chris, I'd appreciate you not  
9 coach.

10 MR. BOYNTON: I am not coaching. I'm just  
11 saying if she has other thoughts she needs to  
12 share them.

13 A. That's really all I have to say.

14 Q. Yes. But my question is a little  
15 different, which is that to the extent you have  
16 opinions about -- I can run through them all  
17 myself and we can talk about them that way or --  
18 but we're going to talk about the various pros and  
19 cons of the system. So would you like to share  
20 with me your opinions about it or would you like  
21 me to run through them one-by-one?

22 A. When you have a district, I think that you

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1 have to -- people don't look at the entire city.  
2 They only represent that one district. What's  
3 best for the entire city, they're only going to  
4 care about what is good for their district. So  
5 when you have an at-large system, you have --  
6 everyone votes for you, so you have to care about  
7 everything that happens in the city.

8 Q. Okay. What do you think the purpose is of  
9 having this hybrid system where you -- everyone is  
10 voted for at-large but they're in one of the last  
11 residency districts?

12 A. Because the city is really large. When I  
13 came here today, I came down all along Stumpy  
14 Lake, which I rarely come down. And I'm looking.  
15 I don't know this area of the city very well  
16 because I never get over there. So we have to  
17 rely upon district Council members to really focus  
18 and know their district, and we can look to them  
19 for advice when we vote on something.

20 Q. Okay.

21 A. So the size of the city really makes a big  
22 difference.

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1 Q. Is that also a reason, maybe, to Council  
2 for a single-member district system?

3 A. But, again, I think it's important that we  
4 have to care about everything.

5 Q. On balance, do you prefer an at-large  
6 election system?

7 A. Probably.

8 Q. Okay. Do you agree that a single-member  
9 district system may make it easier for minority  
10 communities of all sorts, including political  
11 minorities, to be able to elect their candidates  
12 of choice?

13 A. No.

14 Q. Why not?

15 A. I don't see the advantage of it.

16 Q. If there was a district that was a  
17 majority minority as far as --

18 A. But we didn't find that we had one.

19 Q. Right. So put aside that opinion. If  
20 there were 10 districts drawn and one of those was  
21 a majority minority district, could you see how  
22 that would improve the ability of the minority

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1 community to ensure that they could elect a  
2 candidate of choice?

3 A. Well, I think this last election showed we  
4 were able to elect two within the at-large system.

5 Q. Yes. I understand that. But I asked a  
6 slightly different question, which is can you  
7 imagine how having a single-member district that's  
8 majority minority might enable the minority  
9 community to more consistently elect candidates of  
10 choice?

11 A. If it's proven that we have that. But we  
12 haven't seen it's proven that we do.

13 Q. Right. I'm asking you --

14 A. I answered your question.

15 Q. Okay. Are you aware of any other cities  
16 this size that have an at-large election system?

17 A. No.

18 Q. Virginia Beach is the largest city in  
19 Virginia; is that correct?

20 A. That's correct.

21 Q. Okay. Your neighboring cities have  
22 single-member districts, correct, Norfolk for

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1 example?

2 A. Norfolk does. Chesapeake has a totally  
3 at-large system.

4 Q. Do you know what bullet voting is?

5 A. No.

6 Q. So if you have a completely at-large  
7 system without numbered posts and residency  
8 districts.

9 A. You can single shot one person.

10 Q. Single shot. Yes. So you're familiar  
11 with the term single shot?

12 A. Yes.

13 Q. Okay. With the exception of the off year  
14 in which there are two at-large seats in Virginia,  
15 is it the case that single shot voting is not an  
16 option in Virginia Beach; is that correct?

17 A. Correct.

18 Q. Okay. Do you think that might limit a  
19 minority community's ability to elect candidates  
20 of their choice?

21 A. No. I think people will vote for the best  
22 candidate.

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1           Q. But to the extent that the minority  
2 community does have a different candidate of  
3 choice than the white community in a particular  
4 race --

5           A. I don't -- I think people will vote for  
6 the best candidate.

7           Q. Yes. But I think everyone would agree  
8 that people vote --

9           A. I think people would vote for the best  
10 candidate.

11          Q. But that's not the answer to my question.  
12 My question is --

13          A. Do you -- you can't tell me what my answer  
14 should be.

15          Q. No, Ms. Wilson, but I can ask -- I'm going  
16 to clarify my question to the best of my ability.

17                Would you agree that sometimes different  
18 communities have different candidates that they  
19 would prefer?

20          A. It's always the case.

21          Q. Exactly.

22                So if one community has a preferred

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1 candidate and another community has another  
2 preferred candidate, if one community is in the  
3 minority, is the lack of access to single shot  
4 voting an obstacle to them electing their  
5 candidate of choice?

6 A. I think that takes the assumption that  
7 everyone is going to block vote just because of  
8 the color of somebody's skin or the kind of race  
9 they are. And I think people will vote for the  
10 best candidate.

11 Q. I didn't actually talk about race in my  
12 example at all. I just talked about different  
13 groups of people with different preferences of  
14 which you've testified that happens in every  
15 election. So in my hypothetical I didn't talk  
16 about race at all. I didn't make any assumptions.

17 A. Or any block. Any block. I mean, I  
18 don't -- people don't necessarily have to vote by  
19 block. They're going to vote for the best  
20 candidate in many cases whether it's because if  
21 you're a teacher or if you're a race or whatever  
22 it is that -- the community that you're looking



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1 for.

2 Q. So, Ms. Wilson, is it your testimony that  
3 you don't --

4 A. Because --

5 Q. You don't --

6 A. Because we have freedom of choice.

7 Q. I understand that.

8 Is it your testimony that you don't  
9 understand what the benefits of single shot voting  
10 are in some cases for blocks of voters?

11 A. Well, again, you're saying blocks. I  
12 understand single shot voting.

13 Q. And what do you understand single shot  
14 voting to be?

15 A. Well, if you -- because I ran for the  
16 School Board in a two-person race.

17 Q. Uh-huh.

18 A. And you can just vote for one person. A  
19 lot of times a candidate will say, Just vote for  
20 me because there is a power of two votes for that.

21 Q. Are you denying that there are sometimes  
22 blocks of voters that exist in the world that

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1 choose to vote together?

2 A. I didn't say that, but -- I said that not  
3 everyone is going to be in a block.

4 Q. Of course.

5 So for blocks of voters that exist, what  
6 are the benefits of single shot voting?

7 A. They get two votes for their one candidate  
8 or how many -- depends on how many there are in  
9 the race.

10 Q. So it can be a benefit for a block of  
11 voters to single shot vote?

12 A. If they vote by block.

13 Q. Yes. Okay. Thank you.

14 MR. BOYNTON: Please move on.

15 A. You know, you don't have to shake your  
16 head at me.

17 Q. I'm just shaking my head at Chris.

18 A. You're shaking your head.

19 MR. LAMAR: Can we go off the record for a  
20 second?

21 (A discussion took place off the record.)

22 Q. Of your colleagues, who are you aware of

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1 that supports a change in the electoral system?

2 A. I don't know. I can't speak for them.

3 Q. Ms. Abbott has spoken publicly?

4 A. Yes.

5 Q. What about Council Member Moss?

6 A. I don't know his position.

7 Q. You don't know the position of any other  
8 City Council members on this issue?

9 A. No.

10 Q. Okay. Have you spoken to other City  
11 Council members about their position on this  
12 issue? I'm not asking you to disclose the nature  
13 of those conversations or what was said but who  
14 you have spoken to.

15 MR. BOYNTON: So who, not what. Not what  
16 was discussed but who you spoke with, if anyone.

17 A. I don't remember.

18 Q. Have you spoken to Mayor Dyer about this  
19 issue?

20 A. No.

21 Q. Have you spoken to Jim Wood about this  
22 issue?

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1 A. I don't recall.

2 Q. Have you spoken to Louis Jones about this  
3 issue?

4 A. I don't think so.

5 Q. Have you spoken to Barbara Henley about  
6 this issue?

7 A. Yes.

8 Q. Okay. And when was that?

9 A. Probably February of last year -- of this  
10 year. February, maybe.

11 Q. This year or last year?

12 A. This year.

13 Q. Okay. Have you spoken to Michael  
14 Berlucchi about this issue?

15 A. No.

16 Q. Guy Tower?

17 A. I asked him what his position was when  
18 he --

19 Q. And what did he say?

20 A. It's in his report. I can't -- I don't  
21 remember. He had concerns, but it was one way or  
22 the other. He was kind of squiggly on his answer.

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1 Q. Same with Michael Berlucchi or did he have  
2 a more specific response?

3 A. It was probably in his application, but I  
4 didn't talk to him about it, that I know of.

5 Q. Have you spoken to any --

6 A. I really would like to talk about what --  
7 the legal case.

8 MR. BOYNTON: She's not asking what you  
9 said at this point. She's asking who you talked  
10 to.

11 A. She asked me what Mr. Tower said.

12 MR. BOYNTON: Because that was in a  
13 written document, public forum as opposed to --

14 A. Which they can look at.

15 MR. BOYNTON: -- when they were not  
16 Council members at the time, which is -- it's when  
17 they were Council members at the time that you get  
18 legislative privilege. So these were applicants  
19 to become Council members, so she can go a little  
20 bit further on those for what it's worth.

21 A. Okay.

22 MS. LANG: Thank you.

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1 Q. And have you spoken to any constituents  
2 about this issue?

3 A. It's just not a hot topic of things that  
4 we're talking about right now, so not that I can  
5 remember.

6 Q. So you don't recall any conversations with  
7 any constituents about this issue?

8 A. Not that I remember.

9 Q. Okay. Have you spoken to any members of  
10 the Interdenominational Ministers Conference about  
11 this issue?

12 A. No.

13 Q. Do you know what their position on this  
14 is?

15 A. I think they're probably for it, but  
16 that's a guess. You'd have to ask them.

17 Q. And why would you guess that they're  
18 probably for it?

19 A. It's just a guess on my part.

20 Q. But what would make you think that?

21 A. I'm not sure.

22 Q. Is it because you're aware that the

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1 African American community has been largely in  
2 support of a change?

3 MR. BOYNTON: Object to the form of the  
4 question.

5 But you can answer. You can answer. I  
6 just have to put my objection on the record to the  
7 way the question was phrased.

8 A. You have to ask it again.

9 MS. LANG: Can you read back the question?

10 (The question was read by the reporter.)

11 A. Well, that's a whole big block of people.  
12 I can't speak for what the African American  
13 community wants. It's a large group of people.  
14 When you talk about the Ministers, that's one  
15 group. But there is -- it's like saying everybody  
16 who's got brown hair and glasses, you know, what  
17 do they think?

18 Q. Right. And I was not suggesting that.  
19 You guessed that the Ministers Conference was for  
20 it. I'm trying to understand --

21 A. Okay.

22 Q. -- why you might make that assumption.

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1           A. Then you asked for the whole African  
2 American community, and so I can't speak to that.

3           Q. No. I asked whether or not you were aware  
4 that significant portions of the minority --

5           MS. LANG: Would you read the question?

6           MR. BOYNTON: The original question was  
7 why you believed the Interdenominational Ministers  
8 Conference supported a change. And I think this  
9 is all a way of getting to that question.

10          MS. LANG: Yes.

11          MR. BOYNTON: So perhaps if we focused on  
12 that, then we could avoid some of the back and  
13 forth. Do you have reasons to believe or what  
14 informs your opinion that the IDC or IMC --

15          A. They probably do, but I haven't had a  
16 conversation with them so I can't tell you exactly  
17 what you're asking.

18          Q. Right.

19                But in order to form the opinion that they  
20 probably do, you would have to have some educated  
21 reason for forming that opinion. And that's what  
22 I'm asking you for.



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1 A. It's a slight opinion. It's not, wow, I  
2 know they really believe this. It's a guess on my  
3 part.

4 Q. Right.

5 So I'm asking for the basis of the guess.

6 A. I can't tell you. I can't tell you.

7 Q. Are you aware that some leaders in the  
8 African American community have asked for this  
9 change?

10 A. Such as who?

11 Q. Gary McCollum?

12 A. He probably has.

13 Q. Dr. Allen?

14 A. He probably has, but I haven't heard that  
15 from him.

16 Q. Okay. Do you agree that having minority  
17 participation on City Council is an important  
18 goal?

19 A. Yes, I do.

20 Q. Ms. Abbott had planned to bring up her  
21 district elections proposal for a vote, but she  
22 testified that she got the strong sense that it

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1 would be rejected. Did you support Council Member  
2 Abbott's district proposal?

3 MR. BOYNTON: Without going into the  
4 substance of private conversations you had with  
5 her.

6 A. She never asked me.

7 Q. But did you support it?

8 A. I can't -- we never had a discussion, so I  
9 can't say one way or the other because it didn't  
10 come up.

11 Q. Was it in your legislative packet? Was it  
12 in your weekly packet?

13 A. I don't know. Maybe.

14 Q. Okay.

15 A. We get a lot of stuff.

16 Q. Was it discussed at the retreat in  
17 February?

18 A. It was brought up but not discussed.

19 Q. What's the difference between brought up  
20 and discussed?

21 A. A Council member could bring something up  
22 and say something about it. And if no one else --

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1 if there is no further interaction, it's not a  
2 discussion.

3 Q. Okay. Ms. Abbott has written that a  
4 district system would lead to the following:  
5 Incumbents would find themselves less insulated  
6 from the competition of challengers because it is  
7 easier and less costly to run a grassroots  
8 campaign in a district consisting of roughly  
9 30,000 neighbors rather than 300,000 voters in the  
10 largest City of Virginia.

11 Would you agree with that statement?

12 A. No.

13 Q. Why not?

14 A. Because someone can still raise a lot of  
15 money and just flood that district with even more  
16 stuff; it just goes further. You can still raise  
17 a lot of money. And instead of just going  
18 door-to-door, someone could put something in their  
19 mailbox every day. They could still be on TV. I  
20 mean, it could still be a lot of money spent.

21 Q. Right.

22 But in order to run in the entire city of

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1 Virginia Beach, would you agree that that's always  
2 an expensive endeavor?

3 A. No. Ms. Abbott won with a very small  
4 budget. Bobby Dyer won with a very small budget.

5 Q. You've spent six figures on your --

6 A. Uh-huh.

7 Q. -- campaigns, though?

8 A. But that's not everyone.

9 Q. Okay.

10 A. I mean, what did Jessica Abbott spend?  
11 20,000. And she beat an incumbent.

12 Q. That was the only incumbent that's been  
13 defeated in quite some years; is that correct?

14 A. No. We get incumbents knocked off all the  
15 time.

16 Q. I believe Amelia Ross-Hammond is the only  
17 incumbent --

18 A. That's --

19 Q. -- that's been defeated --

20 A. That particular year.

21 Q. -- since 2008?

22 A. I have to look at it. We have had

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1 appointees that have not won.

2 Q. Okay. Under the current system it's true  
3 that you can --

4 A. John Uhrin lost as an incumbent in 2018,  
5 and he lost to someone with a lot less money.

6 Q. Is it possible for a candidate to lose  
7 their district but still win election?

8 A. Yes.

9 Q. Okay. Do you know whether or not that's  
10 happened before?

11 A. David Nygaard, and I think Barbara Henley.

12 MR. BOYNTON: I don't know.

13 A. Have to look at the numbers, but that's  
14 what I think. David Nygaard lost the Beach  
15 district and won the city.

16 Q. Are there currently plans to bring up a  
17 vote on whether or not to put a change in the  
18 electoral system up for another referendum?

19 A. Maybe. I don't know.

20 Q. Would you support that?

21 A. I'm not ready to make a position on that.

22 Q. Are you familiar with ranked choice

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1 voting?

2 A. No.

3 Q. How would you describe your job duties as  
4 a City Council member?

5 A. Well, it's pretty wide and varied. I  
6 mean, we are in the middle of having to hire a  
7 City Manager. We have a budget. We have to  
8 listen to constituents. We have to go to  
9 meetings. We have to answer emails. We have to  
10 try to listen to all sides of issues. We have to  
11 try to be available to the public and be out and  
12 about, and be fair, and try to be fair and honest,  
13 and try to make good decisions.

14 Q. It's a part-time job with a part-time  
15 salary; is that correct?

16 A. And no staff.

17 Q. So part-time job, yes?

18 A. Part-time job.

19 Q. Part-time salary?

20 A. Part-time salary and no staff.

21 Q. So that's quite challenging?

22 A. Yes, it is.

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1 Q. Okay. As a real estate agent, do you have  
2 some flexibility in your work hours?

3 A. Yes, I do.

4 Q. Does that help you fulfill --

5 A. Yes, it does.

6 Q. Try to let me finish the questions just  
7 for the sake of the court reporter. I know you  
8 know what I'm going to ask, but just for the sake  
9 of the court reporter.

10 What are the ways in which you communicate  
11 directly with your constituents? I know right now  
12 you're doing a lot more of it for campaigning.  
13 But as a general matter, how do you communicate?

14 A. I deal more with phone calls than I do  
15 emails.

16 Q. Do you hold town hall meetings?

17 A. I have not.

18 Q. Okay. Do you go to talk to Civic Leagues  
19 or --

20 A. I really am out in the public a lot. I'm  
21 always available.

22 Q. So what kinds of events in the public do

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1     you do?

2           A. I go to different meetings. I go to  
3     events, to different things I'm invited to. I go  
4     to Civic League meetings.

5           Q. So you tend to go to other meetings and  
6     events rather than hold your own town halls?

7           A. Correct.

8           Q. Okay. And how can your constituents reach  
9     you by phone? Do you have an office phone number  
10    or how do constituents reach you?

11          A. I have my home phone number.

12          Q. Is that available to constituents?

13          A. Yes.

14          Q. Oh?

15          A. Yes.

16          MR. BOYNTON: Old school.

17          A. And their messages go to my email.

18          Q. Have you ever been involved in any other  
19    litigation as a City Council member?

20          A. No.

21          Q. Okay.

22          A. You're my first.



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1 Q. As a City Council member, what have you  
2 done to reach out to racial minority communities  
3 and groups in the city?

4 A. I go to Civic Leagues. I go to churches.  
5 I have a good relationship with the Hampton Roads  
6 Black Caucus. I attend the NAACP.

7 Q. Their meetings or forums or how do you  
8 attend?

9 A. They have events. They had a breakfast  
10 not long ago I attended. They have the Freedom  
11 Banquet coming up that I haven't bought tickets to  
12 but I will.

13 Q. How about the Latino or Hispanic  
14 community?

15 A. I have a very close relationship with  
16 them.

17 Q. With who in particular?

18 A. A fellow named Omar Gonzales.

19 Q. And what group is he affiliated with?

20 A. He's Hispanic. He runs the Hispanic  
21 newspaper.

22 Q. The newspaper?

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1           A. Uh-huh. I was really able to help them --  
2           we're getting ready to start the first Police  
3           Academy that's going to be in Spanish. They're  
4           very excited about it.

5           Q. That's great.

6           A. And I've helped them with Economic  
7           Development. The business license application is  
8           not in Spanish, so I set them up with Economic  
9           Development to talk to them to try to get it in  
10          Spanish.

11          Q. How about with the Asian community?

12          A. Good relationship. My daughters-in-law  
13          are Chinese. In fact, they're holding something  
14          for me next Saturday, not this Saturday but next  
15          Saturday, to meet Chinese families.

16          Q. The in-laws?

17          A. Uh-huh.

18          Q. And they're here in Virginia Beach?

19          A. Uh-huh. Yes. Excuse me.

20                 MR. BOYNTON: It's hard to overcome habits  
21          like that.

22          A. Yes.

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1 I attend a lot of Filipino events. I have  
2 a lot of friends in the Filipino community.

3 Q. Who would you identify as some of the  
4 leaders in the Filipino or Asian community?

5 A. Mary Abrajano, Naomi Estares, Dr. Cynthia  
6 Romero, Burt Dio.

7 Q. What are some of your current priorities  
8 for the City Council?

9 A. I want Rudee Loop to be a park of the  
10 people.

11 Q. What does that mean?

12 A. Well, just turn around. Look at that  
13 picture. See where that big -- see the bridge?

14 Q. Uh-huh.

15 A. To the right of the bridge, all of those  
16 10 acres there and on the oceanfront.

17 Q. You want to develop that into a park?

18 A. And I don't like to use the word develop.  
19 I would like us to build a park.

20 Q. Okay.

21 A. Because I don't want commercial  
22 development. And I want us to provide parking.

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1 And I want it to be for people.

2 Q. Would that be done through a private  
3 partnership?

4 A. Yes. I think that there may be a  
5 nonprofit that might raise the money for building  
6 a park, and for the city to provide parking  
7 because they have no parking. There is a lot of  
8 surfing that goes on down there. There is a lot  
9 of fishing that goes on there. I'd really like to  
10 make sure that those people can keep surfing, keep  
11 fishing. Maybe have a little stage so we can have  
12 events. And my own little personal thing, that's  
13 going to take a lot of public influence, I'd  
14 really like to see a little splash park for the  
15 children. It's 10 acres. The city owns it.

16 Q. So that's your main priority at the  
17 moment?

18 A. Right now.

19 Q. Okay. And where is that in the process?  
20 The idea phase?

21 A. It's in the idea phase. Thank you for  
22 helping me out.

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1 Q. No problem.

2 Any other major priorities?

3 A. Of course. I mean, we're working on  
4 flooding and sea level rise and storm water.  
5 Education is always a big one for me. I was a  
6 teacher.

7 Q. Is there --

8 A. You want to talk about my students Learn  
9 to Swim Program?

10 Q. No.

11 A. Should I tell them?

12 MR. BOYNTON: You can.

13 A. So I have a program. We live in a water  
14 community, which you can see right there. And  
15 when I was a child I almost drowned. And I still  
16 don't swim. So I felt that -- well, drowning is  
17 the second leading cause of death for children  
18 under 15. 70 percent of African Americans don't  
19 swim.

20 And so I worked with the schools. It took  
21 six years for them to finally let me get this  
22 done. And so now we are teaching our second

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1 graders how to swim. And we started with the  
2 at-risk -- the most at-risk schools first. And,  
3 then, we got through all the Title 1 schools. And  
4 now it's in about 28 schools now that our second  
5 graders are learning how to swim. Who knows how  
6 many lives we will have saved. And about 2,700  
7 children a year are learning how to swim.

8 Q. That's great.

9 You mentioned at-risk schools.

10 A. These are your Title 1 schools.

11 Q. Yeah. How many Title 1 schools are there  
12 in Virginia Beach?

13 A. I think there are about 12; 11 or 12. I  
14 think there are about 12.

15 Q. And are those Title 1 schools primarily in  
16 low income communities?

17 A. They're scattered around the city. I  
18 don't -- I can't identify all of them.

19 Q. Fair enough.

20 A. One of them is Seatack.

21 Q. Okay.

22 A. And, then, what our Parks and Recreation

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1 Department does before the program starts in  
2 August, when all the bathing suits are on sale  
3 they do a bathing suit drive so that no one is  
4 deprived or no one can say, you know -- or be  
5 embarrassed because they don't have a bathing  
6 suit. And I raised the money for it initially  
7 because we didn't have funding for it.

8 Q. That's great.

9 The Title 1 schools, is there, as there is  
10 in many places, an identified achievement gap  
11 between low income and high income --

12 A. I can't answer that. I don't know.

13 Q. You don't know whether or not there is an  
14 achievement gap?

15 A. I know that all of our schools are  
16 accredited.

17 Q. But you're not aware of any achievement  
18 gap in Virginia Beach?

19 A. I don't know what it is. Yeah. It's -- I  
20 just don't know.

21 Q. You don't know if it exists at all?

22 A. I'm not on the School Board anymore.

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1 Q. I understand that.

2 A. I'm trying to answer you. I don't know.

3 Q. Okay. Are you aware of any achievement  
4 gap between racial minority children and white  
5 children in Virginia Beach?

6 A. I haven't looked at the numbers. I mean,  
7 when on the School Board I was more aware of it.

8 Q. Was there one at the time that you were on  
9 the school -- on the School Board?

10 A. Well, the Title 1 schools are there to  
11 provide additional resources for those children  
12 who are more socioeconomically deprived.

13 Q. But when you were on the School Board were  
14 you aware of an achievement gap between minority  
15 students and white students in Virginia Beach?

16 A. I think so.

17 Q. Okay. And between low income and high  
18 income students?

19 A. Oh, yes.

20 Q. Okay. Do you --

21 A. That's why additional resources were given  
22 to the Title 1 schools.



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1 Q. Of course.

2 Are you aware of any reason to believe  
3 that achievement gap has disappeared since your  
4 time on the School Board?

5 A. Since all of our schools are accredited, I  
6 think we've probably made some really good strides  
7 toward it.

8 Q. Sitting here today, do you believe that  
9 the -- there is no longer an achievement gap  
10 between minority students and white students?

11 A. I can't say that there isn't. I don't  
12 know.

13 Q. Okay. So you have no sense --

14 A. I'd have to see the numbers.

15 Q. It's a yes or no question. You either  
16 have a sense of whether or not there is an  
17 achievement gap or you don't. So yes or no?

18 A. I don't know because I'd have to see the  
19 numbers.

20 Q. Okay.

21 A. We're going to have to wrap up soon. How  
22 much more do you have to ask?

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1 Q. I mean, at least another half an hour or  
2 45 minutes.

3 MR. BOYNTON: Can we shoot for 5 and --  
4 I'll be your blocking back and drive you up there.

5 A. I've got to stop by my house first.

6 MR. BOYNTON: You have to be there when?

7 A. It starts at 6. It's on the other side of  
8 town. And I have to stop by the house.

9 MR. BOYNTON: Off the record for a second.

10 (A discussion took place off the record.)

11 Q. Virginia Beach recently conducted a  
12 disparity study; is that correct?

13 A. That's correct. Yes.

14 Q. When is the earliest that you remember  
15 leaders in the minority community asking for a  
16 disparity study?

17 A. I don't remember.

18 Q. Was it years?

19 A. I don't remember.

20 Q. Was there a march in early 2017?

21 A. Yes.

22 Q. And when did the city vote to --

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1 A. Soon after that.

2 Q. Was it in 2017 that the city voted for a  
3 disparity study?

4 A. I don't know the date. It would have --  
5 but we listened to -- you know, with the march,  
6 but I can't tell you the date. I don't remember.

7 Q. There were two years of marches; is that  
8 correct?

9 A. I don't know. I know one.

10 Q. Okay. I'll represent to you that there  
11 were two years of marches, one in 2017 --

12 A. I'll take your word for it.

13 Q. One in 2018.

14 Are you aware that some members of the  
15 minority community were frustrated by the amount  
16 of time it took for the City Council to agree to a  
17 disparity study?

18 A. Yes.

19 Q. And that Mayor Sessoms did not at first  
20 support --

21 A. Yes.

22 Q. -- a disparity study?

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1 I believe it was Jessica Abbott, and then  
2 Mr. Davenport, that were the first City Council  
3 members to come out in support of a disparity  
4 study; is that correct?

5 A. I know Ben did. I don't know about  
6 Jessica.

7 Q. And when did you first come out publicly  
8 in favor of a disparity study?

9 A. With the discussions I ended up supporting  
10 what they wanted to do, but I don't remember when.

11 Q. Okay. Did you ever take a public stance  
12 before the vote on the disparity study?

13 A. I think I talked about it at the Council  
14 meeting. It was a concern of, you know, how much  
15 it was going to cost, who was going to pay for it.

16 Q. Did you share some of those concerns about  
17 cost?

18 A. I said there was a concern. I don't think  
19 vocally I did, no.

20 Q. Did you have any of those concerns?

21 A. When you're in a government and you have  
22 limited resources, you have concern about all

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1 costs.

2 Q. Okay. What was the overall finding of the  
3 disparity study?

4 A. There was a disparity, but we had been  
5 making strides. And that's our own results  
6 showing that. But we found that there were some  
7 things we could do to improve. And I think  
8 everybody was excited to be able to improve. We  
9 want to do the right thing.

10 Q. And the disparity study found overall the  
11 participation of minority-owned businesses in  
12 contracts that the city awarded during the study  
13 period was substantially lower than what one might  
14 expect based on the availability of those  
15 businesses for that work; is that correct?

16 A. I guess it depends on what substantial  
17 means.

18 Q. Well, I just read from the --

19 A. Yeah.

20 Q. -- report. Is that your understanding of  
21 what the report said?

22 A. We had been increasing, so we were

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1 making -- that's what you do is you make strides.  
2 And that's where we were. And so now we have some  
3 tools to improve.

4 Q. And what are some of those tools?

5 A. Well, one is to pay people faster.

6 Q. And what has the city done to do that?

7 A. They've expedited the payment processes.

8 Q. Okay. What else did the study recommend?

9 A. You know, more outreach, try to -- and,  
10 then, working with contractors to try to get their  
11 subcontractors to do more.

12 Q. Okay. Anything else that the study  
13 recommended?

14 A. More education for outreach.

15 Q. So education and outreach, expediting  
16 payment, and encouraging general contractors to  
17 subcontract with minority-owned businesses?

18 A. Correct.

19 Q. Anything else?

20 A. And we -- you know, before this we hired  
21 someone to be on the staff.

22 Q. Is that Taylor Adams?

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1 A. Yes.

2 Q. Okay. And what action has the City  
3 Council taken since the disparity study was  
4 released to --

5 A. We've asked the city to do these things,  
6 to advance -- to advance these recommendations.

7 Q. Was one of the recommendations to create a  
8 SWaM office?

9 A. I don't know. I don't remember.

10 Q. Okay. Are you aware that Sabrina Wooten  
11 asked for staffing for an officer to take the  
12 position to work on SWaM issues?

13 A. I don't remember.

14 Q. Okay. I'll represent to you that she  
15 asked for that in the 2020 budget and it was not  
16 included in the budget.

17 A. Okay.

18 Q. Do you know why that might be?

19 A. We had competing needs.

20 Q. Would you have considered it a priority to  
21 have funded that position?

22 A. I don't think it's considered a priority

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1 when we're dealing with flooding, but I think it's  
2 got the important place.

3 Q. The 2020 budget added about 50-odd  
4 positions to the City Council budget; is that  
5 right?

6 A. I think we opened up a new fire station  
7 and, you know, these sorts of public safety, and,  
8 then, also to deal with flooding.

9 Q. Okay.

10 A. Flooding is --

11 Q. So all 50 of those positions were either  
12 public safety or flooding?

13 A. I can't answer all of them were, but --

14 Q. Right.

15 A. But we're dealing a lot with storm -- sea  
16 level rise and flooding. And that's huge. That's  
17 a safety issue.

18 Q. So you're not aware if you supported or  
19 didn't support Ms. Wooten's request for an office  
20 for SWaM issues?

21 A. She didn't talk to me about it.

22 Q. Okay. What were your priorities for the



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1 2020 budget?

2 A. All day kindergarten. All day  
3 kindergarten, flooding, fixing compression for  
4 public safety.

5 Q. Did you make any specific requests for  
6 additions to the 2020 budget?

7 A. I asked for the historical homes to be  
8 moved from the Aquarium to Cultural Affairs.

9 Q. Are you aware that Council Member Rouse  
10 asked for some parking and signage for the Seatack  
11 Community?

12 A. No.

13 Q. Would you support those requests?

14 A. Sure.

15 Q. Do you have any idea why they weren't  
16 included in the 2020 budget?

17 A. No. And I don't know the specifics of his  
18 request. I do not know.

19 Q. Who is Bruce Smith?

20 A. Bruce Smith is a developer and an  
21 ex-football player.

22 Q. And have you ever met with Bruce Smith?

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1 A. Uh-huh.

2 Q. About how many times?

3 A. Twice, I think.

4 Q. And what did you talk to him about?

5 A. Talked to him about my campaign.

6 Q. Okay. And did he support your campaign?

7 A. No.

8 Q. Okay. Did you -- did he tell you why not?

9 A. He said he wanted me to stay in my current  
10 seat.

11 Q. Okay. So you talked to him about your  
12 most recent current --

13 A. Yeah. He liked me where I was.

14 Q. Okay.

15 A. He liked to support me where I was but not  
16 to move.

17 Q. Okay. And Mr. Smith has been quite vocal  
18 about his belief that minority businesses have not  
19 always gotten a fair shake in Virginia, is that  
20 right, or in Virginia Beach?

21 A. Yes. Yes.

22 Q. Do you agree with his views on the

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1 opportunities that have been given to minority  
2 businesses in Virginia Beach over the years?

3 A. I'm not sure I'd agree with him.

4 Q. Okay. Do you disagree with him on some of  
5 those issues?

6 A. I voted for the apartments at the Hyatt  
7 House that he wanted.

8 Q. Okay. So since you voted for the  
9 apartments at the Hyatt House --

10 A. It's a building. I don't know what you  
11 call it, but it's next door to the Hyatt Hotel on  
12 Atlantic Avenue. That was his project.

13 Q. Right.

14 A. He -- so I met with him, and I told him I  
15 would support it. And I did.

16 Q. But my understanding is that Mr. Smith's  
17 concerns are not about a particular project but  
18 about whether or not there's been an equal  
19 opportunity for minority businesses in Virginia  
20 Beach. Would you agree that that's a fair  
21 criticism of the Virginia Beach system?

22 A. I think they're all decided on merit, not

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1 according to what race you are.

2 Q. So any charge that there has been some  
3 level of self-dealing or cronyism that has led to  
4 racial disparities, you would disagree with?

5 A. Yes.

6 Q. Is it the case that City Manager Hansen on  
7 several occasions was identified to have shared  
8 internal information with Bruce Thompson about  
9 contracting with Virginia Beach?

10 A. I think there was some email that, you  
11 know -- I think there was, like, one email.

12 Q. Did that concern you?

13 A. I didn't think it was a big deal. No.

14 Q. If the City Manager was sharing  
15 information with some developers and not others,  
16 would that be a big deal?

17 A. Yes. But I think the specific question is  
18 something that -- and I don't remember the email  
19 totally. I'm just -- it was a specific question  
20 about a particular project.

21 Q. Do you know who George Minns was?

22 A. Yes.

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1 Q. Prior to his recent passing, did you ever  
2 get the chance to visit with Mr. Minns or speak  
3 with him?

4 A. He came to -- I started the Historical  
5 Preservation Commission, which he was very  
6 interested in, and he came to some of our  
7 meetings.

8 Q. Okay. And Mr. Minns was also quite vocal  
9 in his concerns that minority businesses weren't  
10 given an equal opportunity in Virginia Beach; is  
11 that right?

12 A. I don't know.

13 Q. Okay. Do you think there is any validity  
14 to Mr. Minns or Mr. Smith's concerns that minority  
15 businesses were not always given a fair or equal  
16 opportunity in Virginia Beach?

17 A. No. I don't think so.

18 Q. As we sit here today, do you believe that  
19 Virginia Beach is currently open to all business  
20 persons on an entirely equal basis?

21 A. Yes.

22 Q. Prior to his resignation on August 23rd,

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1 2019, did you think that City Manager Hansen was  
2 doing a satisfactory job?

3 A. In some ways, yes. In other ways, no.

4 Q. And in which ways yes?

5 A. He was a guy that got things done. We  
6 have a lot of storm water flooding issues that are  
7 facing us. He was in the Army Corps of Engineers.  
8 Dave knew how to get things done.

9 Q. And in what ways now?

10 A. He did not have a good demeanor with  
11 dealing with the public.

12 Q. Are you familiar with the comment me made  
13 where --

14 A. Floatopia, yes.

15 Q. Yes.

16 MR. BOYNTON: Wait for her to finish the  
17 question.

18 Q. Yes. The comments related to --

19 A. Yes.

20 Q. -- Floatopia?

21 A. Yes, I do.

22 Q. And did you find those offensive?

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1 A. Yes.

2 Q. What about his communications with another  
3 city official about five percenters?

4 A. I don't think Dave made that comment. I  
5 think it was someone else. And I'm sorry to be  
6 naïve, but I never really understood the term,  
7 something I wouldn't use because I don't really  
8 understand it. So I don't know if he -- if they  
9 knew what the -- what it meant to others or not.  
10 So I'm just not sure because I don't even -- I  
11 still don't understand it.

12 Q. All right. I believe that at some point  
13 Mr. Hansen used the term thugs. Are you familiar  
14 with that?

15 A. Yes.

16 Q. And did you believe that that was  
17 appropriate?

18 A. No.

19 Q. Okay. Are you familiar with any  
20 controversial remarks that Mr. Atkinson has made?

21 A. Yes.

22 Q. And what's one of those?

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1 A. No ticky, no laundry.

2 Q. And when did he say that?

3 A. Years ago.

4 Q. And what's the meaning of no ticky, no  
5 laundry?

6 A. If you don't have your ticket, you know --  
7 I know people were offended by it. And I don't  
8 remember the context, but I remember him saying  
9 it. It was in the paper.

10 Q. And was he reprimanded --

11 A. Yes.

12 Q. -- by the City Council?

13 A. Well, he had to take sensitivity training.

14 Q. Okay. And that was required by the City  
15 Council?

16 A. We asked him to.

17 Q. Okay. Have there been any other incidents  
18 with respect to Mr. Atkinson?

19 A. He had said something about dark-skinned  
20 people standing in line.

21 Q. When was that?

22 A. I don't remember what year it was. It's



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1       been a really long time.

2           Q. And what was the --

3           A. It was in the 2000s. These both happened  
4       about the same time.

5           Q. What did the city --

6           A. He took the sensitivity training. It was  
7       when we used to have a city sticker, and there  
8       were really long lines where people would come in,  
9       because they hadn't paid their taxes, to get their  
10      city sticker.

11          Q. Okay. So these two events happened in  
12      close proximity?

13          A. Very close together.

14          Q. And the city's response was sensitivity  
15      training?

16          A. We asked him to take sensitivity training.

17          Q. Okay. Have there been any other issues  
18      since then?

19          A. Not that I'm aware of.

20               We've got to finish up. It's 10 till 5.

21           MR. BOYNTON: I'm open to suggestions  
22      about rolling over to tomorrow morning or changing

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1 from trains to planes or --

2 MS. LANG: Let's see what I can get  
3 through in 10 minutes.

4 A. I've got five minutes.

5 MR. BOYNTON: Let's see what we can do.

6 Q. Did you call for City Manager Hansen to be  
7 fired?

8 A. That's a personnel issue.

9 MR. BOYNTON: The -- so personnel issue by  
10 itself is not an exception to testifying in a  
11 federal case. If you are having private  
12 conversations with Council members, you are  
13 potentially into a legislative privilege context.  
14 But I'm trying -- I'm trying to help you get to  
15 where you need to go.

16 In terms of direction that was provided to  
17 Mr. Hansen, that is not privileged information.  
18 And your personal opinion is not privileged  
19 either. So if you had a personal opinion, if you  
20 expressed a personal opinion to him, then that is  
21 not something you can avoid testifying about.

22 A. My personal opinion was I did not want to

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1 renew his contract.

2 Q. And did you tell him that?

3 A. No.

4 Q. Okay. Was that communicated to him by  
5 anyone?

6 A. How would I know that?

7 Q. Okay. There was a meeting with him about  
8 the renewal of his contract?

9 A. I did not want to renew his contract. It  
10 was going to cost the city a whole lot of money to  
11 fire him. And I just didn't want the  
12 embarrassment of it all because he worked with --  
13 he loved the city. He worked for the city for a  
14 really long time.

15 Q. But you did not want to renew his  
16 contract?

17 A. I did not want to renew his contract.

18 Q. So he ultimately decided to resign --

19 A. Yes.

20 Q. -- during that meeting about his contract  
21 renewal?

22 A. Yes.

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1 Q. Was it communicated to him during that  
2 meeting that his contract likely would not be  
3 renewed?

4 A. It was a lot of discussion. I don't think  
5 that really was a discussion point.

6 Q. Whether or not his contract would be  
7 renewed was not a discussion point?

8 A. There was a lot of questioning about his  
9 performance.

10 Q. Okay. And at the end of that meeting he  
11 said he would resign?

12 A. At the end of the meeting he got angry,  
13 and he said a lot of things, and he got up and  
14 walked out.

15 Q. Was one of those things that he was going  
16 to resign?

17 A. He said, Pay me off. You know, pay him  
18 the money we would have to pay.

19 Q. And how much did he receive?

20 A. I think it was 130,000. It was about  
21 130,000.

22 Q. Okay. What did he say when he was angry?

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1 A. Do I need to say?

2 MR. BOYNTON: These are statements he is  
3 making, not Council members. So that's a problem.  
4 Give her a summary and let's move on with stuff.  
5 It just is what it is.

6 A. He was unhappy that we felt that way, and  
7 he kind of --

8 Q. I'd like to hear it.

9 A. Well, I'm sure you would.

10 Q. And I'm entitled to it.

11 A. And you're interrupting me now.

12 Q. Can you tell me just what --

13 A. I'm trying to, if you'll allow me.

14 Q. Okay.

15 A. He said, Let's just call it a divorce and  
16 pay me the 130,000.

17 Q. Did he say anything else?

18 A. Obviously, things weren't going well. He  
19 was upset. And he said, Just call it a divorce.  
20 Pay me 130,000 and I'm out of here.

21 Q. Okay. Are you familiar with the Ministers  
22 5 Point Policing Plan?

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1           A. I remember seeing it, but it's been a  
2 couple of years.

3           Q. It was actually first presented to you; is  
4 that correct?

5           A. I've got to go.

6           MR. BOYNTON: You can answer that real  
7 quick, and maybe get you out of here.

8           A. It was presented to me. And I remember  
9 seeing it. And we called a meeting with a whole  
10 lot of people to work on it.

11          Q. Okay.

12          MS. LANG: I don't have much more, but I  
13 do have some things I have to --

14          MR. BOYNTON: Do you want to try to do the  
15 rest of it --

16          MS. LANG: We can do it tomorrow morning.

17          MR. BOYNTON: We can do that. We can do  
18 it telephonically. We can work however is  
19 functional for everybody.

20          MS. LANG: Let's go off the record for a  
21 moment.

22          (A discussion took place off the record.)

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1 (Signature having not been waived, the  
2 deposition of ROSEMARY A. WILSON was adjourned at  
3 5:00 p.m.)  
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ACKNOWLEDGMENT OF DEPONENT

I, ROSEMARY A. WILSON, do hereby  
acknowledge that I have read and examined the  
foregoing testimony, and the same is a true,  
correct, and complete transcription of the  
testimony given by me and any corrections appear  
on the attached Errata Sheet signed by me.

\_\_\_\_\_  
(DATE)

\_\_\_\_\_  
(SIGNATURE)



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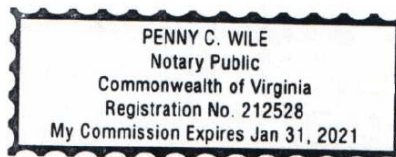
1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Penny C. Wile, RPR, RMR, CRR, the  
3 officer before whom the foregoing deposition was  
4 taken, do hereby certify that the foregoing  
5 transcript is a true and correct record of the  
6 testimony given; that said testimony was taken by  
7 me stenographically and thereafter reduced to  
8 typewriting under my direction; that reading and  
9 signing was requested; and that I am neither  
10 counsel for, related to, nor employed by any of  
11 the parties to this case and have no interest,  
12 financial or otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set my  
14 hand and affixed my notarial seal this 14th day of  
15 October, 2019.

16 My commission expires: January 31, 2021.

17  
18  
19 



20  
21 NOTARY PUBLIC IN AND FOR  
22 THE COMMONWEALTH OF VIRGINIA

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